



U.S. Department of the Interior
Bureau of Land Management

Final

Vale District Office
P. O. Box 700
Vale, Oregon 97918

Baker Resource Area Office
1550 Dewey
Baker, Oregon 97814

September 1986

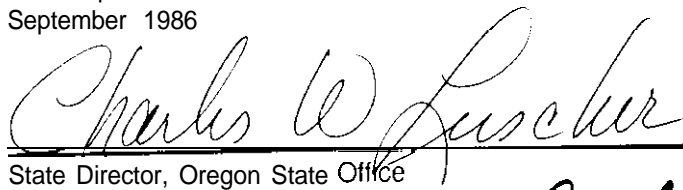


Proposed Baker Resource Management Plan Environmental Impact Statement

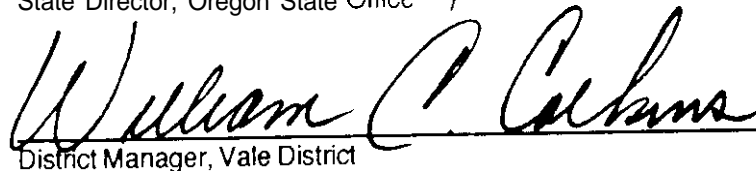


Proposed Baker Resource Management Plan and Final Environmental Impact Statement

Prepared by
Baker Resource Area of the Vale District
Bureau of Land Management
U.S. Department of the Interior
September 1986



State Director, Oregon State Office



District Manager, Vale District



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

VALE DISTRICT OFFICE
P.O. Box 700 (100 Oregon Street)
Vale, Oregon 97918

September 26, 1986

Dear Public Land User:

Enclosed for your review and comment is the Proposed Baker Resource Management Plan and Final Environmental Impact Statement (Proposed RMP/Final EIS) for the Baker Planning Area, Vale District, Oregon. The Bureau of Land Management has prepared this document in partial fulfillment of its responsibilities under the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1969.

The Proposed RMP/Final EIS is published in an abbreviated format and is designed to be used in conjunction with the Draft RMP/EIS published in March 1986. Additional copies of the Draft RMP/EIS are available from the Bureau of Land Management, 1550 Dewey, Baker, Oregon 97614 or 100 East Oregon Street, Vale, Oregon 97918.

This Proposed RMP/Final EIS contains a summary of the Draft RMP/EIS, an introduction, the proposed plan, text revisions to the Draft, public comments received on the Draft, and the Bureau's response to these comments.

If you wish to comment for the District Manager's consideration in the development of the decision, please submit your comments by November 10, 1986. Your comments should be sent to:

District Manager
Bureau of Land Management
P.O. Box 700
Vale, Oregon 97918

The plan decisions will be based on the analysis contained in the EIS, any additional data available, public opinion, management feasibility, policy and legal constraints. The approval of the plan will be documented in a record of decision, which will be completed later and will be available to the public.

The proposed plan cannot be approved until the Governors of Oregon and Washington have had an opportunity to review it. Approval of the plan will also be subject to the final action on any protests that may be filed. Any person who participated in the planning process and has an interest that may be adversely affected by the approval of this RMP may protest such approval. A protest may raise only those issues that were submitted for the record during the planning process, and should be filed with the Director (202), Bureau of Land Management, 1800 C Street, N.W., Washington, D.C. 20240 within the official protest period ending November 10, 1986. Protests must maintain the following information:

--The name, mailing address, telephone number, and interest of the person filing the protest.

--A statement of the issue or issues being protested

--A statement of the part or parts of the plan being protested.

--A copy of all documents addressing the issue or issues that were submitted during the planning process of the protesting party, or an indication of the date the issues were discussed for the record.

--A complete statement explaining why you feel the decision is wrong

Sincerely yours,


William C. Calkins
District Manager

Proposed Baker Resource Management Plan and Final Environmental Impact Statement

Proposed RMP/Final EIS Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (X) Legislative ()

2. Abstract: This Proposed Resource Management Plan/Final Environmental Impact Statement discusses Resource Management on 429,754 acres of public lands administered by the Bureau of Land Management in the Baker Resource Area of the Vale District. The Proposed Plan would harvest timber on 25,353 acres with an estimated sustained decadal harvest level of 27 million board feet (MMBF); grazing management would continue on 50,397 acres of Section 15 grazing lands (111 grazing allotments); 50 miles of riparian zones would be prioritized for management based on their condition and need; wildlife and fish habitat would be maintained or improved throughout the planning area; 18,306.86 acres would be available for land tenure adjustment through exchange, transfer or sale; 139,160 acres would be limited or closed to Off Road Vehicle use; nine Special Management Areas totaling 38,988 acres would be designated as Areas of Critical Environmental Concern: cultural, soil, water, botanical, visual and recreational resources would be maintained or improved.

3. Four alternatives are analyzed:

- A. Continue Existing Management (No Action)
- B. Emphasize Commodity Production
- C. Emphasize Natural Environment Protection
- D. Preferred

4. The public review and protest period will be 30 days, ending November 10, 1986.

5. For further information contact:

Sam Montgomery
RMP/EIS Team Leader
Bureau of Land Management
Baker Resource Area
1550 Dewey
Baker, Oregon 97814

Summary

This Proposed Resource Management Plan/Final Environmental Impact Statement (Proposed RMP/Final EIS) identifies and analyzes four multiple use alternatives for managing public lands in the Baker Resource Area. The RMP was prepared using the Bureau of Land Management planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA). Each alternative represents a complete, reasonable and implementable master plan that provides a framework within which future, more site-specific decisions would be made.

The RMP addresses the forestry, wildlife, minerals, lands, watershed, fire, cultural, recreation, off-road vehicle and special management area programs for the entire Baker Resource Area. It also addresses grazing management, riparian zone management and competitive forage allocation for 50,397 acres (located north of Baker County) that are administered for grazing under Section 15 of the Taylor Grazing Act.

This RMP does not address grazing management, riparian zone management or competitive forage allocation on 379,357 acres (located primarily in Baker County) that are administered for grazing under Section 3 of the Taylor Grazing Act. The 1981 Ironside Rangeland Program summary (RPS) established and describes these programs for "Section 3" grazing lands. The Ironside RPS will continue to be implemented under all the alternatives.

The Four Alternatives Are:

Preferred Alternative

This alternative would provide for production of resources and protection of natural values. This alternative represents the Bureau's favored management approach.

1. Forage available for livestock on Section 15 lands would remain at 4,258 AUMs.
2. Riparian zones on Section 15 lands would be prioritized for management based on their need and potential. Riparian zone management would emphasize cooperative efforts with adjacent federal, state and private landowners.
3. All forage on 3,700 acres within Cooperative Wildlife Management Areas (approximately 350 AUMs) would be allocated to deer and elk on Section 15 areas.
4. A total of 18,307 acres of public lands would be available for disposal pending site-specific study.
5. Nearly all public lands would remain open for mineral exploration and development. A total of 385 acres (less than 1%) would be proposed for withdrawal from mineral entry. Another 18,955 acres (2%) would be open to oil and gas leasing with a "no surface occupancy" stipulation. A seasonal oil and gas leasing restriction would apply to 201,720 acres (21.5%) due to wildlife considerations.

6. The 10-year sustainable harvest level would be approximately 27 million board feet (MMBF) from a commercial forest land base of 25,353 acres.
7. Existing recreation facilities would be maintained or improved, as funding allows, to mitigate damage and sanitary problems associated with increased visitor use. The natural character of the BLM lands along the Grande Ronde River, the Snake River and Joseph Creek will be protected pending resolution of the wild and scenic issue.
8. Approximately 139,160 acres of public land would be limited or closed to off-road vehicle use.
9. Nine SMAs would be designated as ACECs, including one ONA and one RNA. Unique values within other possible SMAs would be maintained under existing authorities.

No Action (Current Management) Alternative

This alternative would maintain the present management under existing decisions of the Baker Management Framework Plan (1979), Grande Ronde Management Framework Plan (1976), Oil and Gas Management Program (1975), Timber Management Program for Eastern Oregon and Washington (1976) and several resource activity plans. Outputs from public lands and resources would generally continue at the present level.

1. Forage available for livestock on Section 15 lands would remain at the current level of 4,258 Animal Unit Months (AUMs).
2. Existing custodial management of riparian zones would continue on Section 15 lands.
3. On Section 15 lands, all forage on 3,700 acres within Cooperative Wildlife Management Areas (approximately 350 AUMs) would continue to be allocated to deer and elk.
4. About 20,000 acres of public land would be available for disposal pending site-specific study.
5. All public lands would remain open for mineral exploration and development. A total of 22,215 acres (2.3%) would be open to leasing with "no surface occupancy" stipulation, and 25,145 acres (2.6%) would remain closed to leasing.
6. The 10-year sustained harvest level would be 28 MMBF from 31,290 acres of commercial forest lands.
7. Current recreation facilities would be maintained within available funding.
8. The current Off Road Vehicle (ORV) designation would remain in effect, with 120,528 acres limited or closed to ORV use. All lands in the Blue Mountain and Grande Ronde Planning Units would remain open to ORV use, except the South Fork of the Walla Walla River which is now "limited".
9. No Special Management Areas (SMAs) would be designated. Unique values in possible SMAs would continue to be protected under existing authorities.

Commodity Production Alternative

This alternative would strive to maximize the utilization of resources and produce the greatest possible revenue. Conflicts would be resolved in favor of commodity resources.

1. Forage available for livestock on Section 15 lands could increase by 764 AUMs, to 5,022 AUMs.
2. Existing custodial management of riparian zones on Section 15 lands would continue.
3. On Section 15 lands, all forage on 3,700 acres within Cooperative Wildlife Management Areas (approximately 350 AUMs) would be allocated to deer and elk.
4. An estimated 12,440 acres of public land would be available for disposal, pending site-specific study.
5. All public lands would remain open for mineral exploration and development. A total of 3,360 acres (0.4%) would be open to oil and gas leasing with a “no surface occupancy” stipulation. A seasonal oil and gas leasing restriction would apply to 14,825 acres (1.6%) due to wildlife habitat considerations.
6. The sustainable 10 year timber harvest level would be approximately 29 MMBF from a commercial forest land base of 26,026 acres.
7. Recreation sites would be redesigned to accommodate increased visitor use, pending available funding.
8. Approximately 122,920 acres of public land would be limited or closed to off-road vehicle use.
9. One SMA would be designated as an Outstanding Natural Area (ONA) and an Area of Critical Environmental Concern (ACEC). Unique values within other possible SMAs areas would be maintained under existing authorities.

Natural Environmental Protection Alternative

This alternative emphasizes maximum protection of natural values. Conflicts would be resolved in favor of protecting natural values.

1. Forage available for livestock on Section 15 lands would be reduced by 30 AUMs, to 4,228 AUMs.
2. Livestock grazing would be excluded from 6 miles of streams on Section 15 lands to protect riparian zones.
3. On Section 15 lands, All forage on 3,700 acres within Cooperative Wildlife Management Areas (approximately 350 AUMs) would be allocated to deer and elk.
4. No public lands would be offered for sale, however transfers and public agency leases would be permitted.
5. Nearly all public lands would remain open for mineral exploration and development. A total of 1,630 acres (less than 1%) would be proposed for withdrawal from mineral entry 34,508 acres (4.7%) would be open to oil and gas leasing with a “no surface occupancy” stipulation. Seasonal restrictions on oil and gas leasing would apply

- to 194,967 acres (20.8%) due to wildlife considerations.
6. The 10-year sustained timber harvest level would be approximately 23 MMBF from a commercial forest land base of 25,333 acres.
 7. Recreation facilities would be maintained and redesigned to mitigate overflow damage and sanitary problems, pending available funding.
 8. Approximately 142,380 acres of public land would be limited or closed to off-road vehicle use.
 9. Twelve SMAs would be designated as ACECs, including one ONA and one Research Natural Area (RNA). Unique values within other possible SMAs would be maintained under existing authorities.

Table 1 summarizes the environmental consequences of implementing each of the alternatives.

Table 1 Summary of Environmental Consequences and Comparison of Alternative Allocations

	Unit of Measure	Preferred Alternative	current Management (No Action)	Commodity Production Alternative	Natural Resource Protection Alternative
Soil	Condition/Trend ¹	+	0		+
Air	Condition/Trend	+	+	+	+
Water					
Quantity	Condition/Trend	+	0		+
Quality	Condition/Trend	+	0		+
Vegetation					
Ecological Condition	Condition/Trend	+	0		+
Plant Diversity	Condition/Trend	+	0		+
Threatened, Endangered or Sensitive Species (Protection)	Condition/Trend	+	0	0	+
Livestock Grazing (Section 15)					
Available Forage	AUMs	4,258	4,258	5,022	4,228
Riparian Zones	Condition/Trend	+	0		+
Wildlife					
Terrestrial Habitat	Condition/Trend	+	0		+
Fish	Condition/Trend	+	0		+
Threatened & Endangered Species	Condition/Trend	+	0	0	+
Recreation					
Visitor Use Levels	Trend	+	0	+	
Quality of Experience	Condition/Trend	+	0	+	+
Cultural Resources (Enhancement)	Condition/Trend	+	0	0	+
Protection/Enhancement of Visual Quality	Trend	+	0		+
Forest Products					
Harvest Level	MMBF	2.65	2.79	2.85	2.29
Off-Road Vehicle					
Open	Acres	290,594	309,226	306,834	287,374
Limited	Acres	138,042	119,560	121,802	141,262
Closed	Acres	1,118	968	1,118	1,118
Land Tenure Adjustment					
Available for Disposal	Acres	18,307	20,000	12,440	0
Mineral Resources					
Withdrawals	Acres	385	0	0	1,680
Locatable Minerals	Trend		0	0	
Leasable Minerals					
Seasonal Stipulations	Acres	201,720		15,815	194,967
No Surface Occupancy	Acres	18,955	22,215	3,360	34,508
Closed to Leasing	Acres	14,825	25,145	14,825	14,825
Saleable Minerals					
Aggregate	#of Pits	24	1	24	1
Economic Activity	Trend	+	0	+	
Change in Local Personal Income	Dollars	20,000	0	456,000	-102,000
Special Management Areas	# of Areas	9	0	1	12
Protection of Values	Trend	+			+

¹ 0 = No Change + = Increase = Decline

Table of Contents

ii	Summary
1	Chapter 1 Purpose and Need for Action
1	Introduction -The Planning Area
2	Purpose and Need
2	Planning Process and Criteria
4	Issues
7	Chapter 2 Proposed Resource Management Plan
7	Introduction
7	Livestock Grazing Management
8	Riparian Zone Management
8	Wildlife & Fish Habitat Management
8	Threatened, Endangered and Sensitive Species Management
8	Land Tenure & Realty Management
9	Mineral Resource Management
10	Soils & Watershed Management
10	Forest Management
10	Fire Management
10	Cultural Resource Management
11	Paleontological Resource Management
11	Recreation Management
11	Off-Road Vehicle Use
11	Special Management Areas
13	Wilderness
13	Visual Resources
13	Noxious Weed Control
14	Grasshopper Control
14	Withdrawal Review
14	Requirements for Further Environmental Analysis
14	Monitoring the Baker Resource Management Plan
17	Chapter 3 Text Revisions
21	Chapter 4 Consultation and Distribution
21	Public Involvement
22	Agencies and Organizations Contacted or Consulted
22	List of Agencies, Persons and Organizations to Whom Copies of the RMP/EIS Have Been Sent
24	Comment and Protest Procedures
25	Comment Analysis and Response

Tables

- iv 1 --Summary of Environmental Consequences and
Comparison of Alternatives
- 1 2--Public Land Acreage, Baker Planning Area
- 4 3--Resource Management Planning Process

Appendices

- 60 A. Standard Design Features
 - 60 Minerals
 - 62 Timber Harvest
 - 66 Fire Management
 - 66 Recreation Sties
 - 66 Visual Resource Managment
 - 67 Cultural Resources
 - 67 Wildlife
- 68 B. Water Quality Measurements
- 69 C. Revision of Table 11, Threatened, Endangered or
Sensitive Species
- 70 D. Revision of Table 36, Impacts to Air Quality from
Average Annual Slashburning & Prescribed Burning
in the Planning Area
- 71 E. Proposed Mineral Withdrawals from Special
Management Area
- 72 F. Land Tenure Adjustment Criteria

Chapter 1

Purpose and Need for Action

Introduction-The Planning Area

This Resource Management Plan (RMP) addresses 429,754 acres of public land and an estimated 939,000 acres of subsurface mineral estate administered by the Bureau of Land Management (BLM).

The RMP consolidates three previously established planning units into one planning area, which is called the Baker Planning Area. The previous planning units were the Baker, Blue Mountain and Grande Fionde Planning Units.

BLM lands in the planning area are scattered throughout six counties in northeast Oregon (Baker, Malheur, Morrow, Umatilla, Union and Wallowa), and portions of two counties in the southeast portion of Washington State (Asotin and Garfield). Refer to Table 2 and Figure 1. The general land pattern in the planning area is characterized by small to moderate sized parcels of BLM administered land that are widely scattered and intermingled with private land, state land, and land administered by the Forest Service (FS) and other federal agencies.

Most of the BLM land in the planning area is located in Baker and Malheur Counties (377,214 acres), where the largest and more closely blocked parcels occur. ELM lands in the six northern counties of the planning area total

Table 2 Public Land Acreage, Baker Resource Area

County	Federal (BLM) Surface	Total Acreage of County
Section 3 Grazing Area		
Baker	367,168	1,930,240
Malheur	10,046	12,040
Wallowa	2,143	2,033,920
	379,357	
Section 15 Grazing Area		
Morrow	2,328	1,317,900
Umatilla	13,178	2,065,280
Union	6,119	1,200,480
Wallowa	18,328	above
Asotin ¹	10,374	109,235
Garfield ¹	70	3,320
	50,397	
Total	429,754	8,772,415

¹ Baker RA managed portion only.

50,397 acres, and generally occur in smaller and more widely scattered parcels.

BLM administered lands in the planning area are managed by the Baker Resource Area office of the Vale BLM district. The Baker Resource Area office is located in Baker, Oregon and the Vale BLM district office is located in Vale, Oregon. BLM lands in Asotin and Garfield Counties in Washington State are managed by the Baker Resource Area office under an interdistrict agreement between the Vale and Spokane BLM district offices.

The planning area is bordered by the Snake River to the east, the Columbia River and State Linetoth north, and by Gilliam, Wheeler, Grant and Malheur Counties to the west and south (refer to Map 1 and Figure 1).

The Wallowa-Whitman National Forest, a portion of the Umatilla National Forest, the Hells Canyon National Recreation Area, Boardman Bombing Range and the Umatilla Army Depot are other major federal lands within the boundaries of the planning area. The Umatilla Indian Reservation and Bureau of Reclamation lands are also within the planning area.

Purpose and Need

The Proposed Baker Resource Management Plan/Final Environmental Impact Statement will provide a comprehensive framework for managing and allocating public land and resources in the Baker Resource Area for the next 10 or more years. The Proposed RMP will serve as a master plan from which future, more site-specific analysis and decisions will be made regarding allowable, conditional or prohibited uses and activities.

More specifically, the Proposed RMP establishes:

- Resource condition goals and objectives;
- Allowable resource uses and levels of production;
- Areas for limited, restricted or exclusive resource uses;
- Areas for retention or transfer from BLM administration;
- Program constraints and general management practices;
- Specific management plans required;
- General resource monitoring standards.

This Proposed Resource Management Plan will provide management direction and environmental analysis for the forestry, wildlife, watershed, fire, cultural, recreation, off-road vehicle, and special management area programs for the entire Baker Planning Area. It will also provide direction and environmental analysis for grazing management, riparian zone management, and competitive forage allocation on 50,397 acres managed for grazing under Section 15 of the Taylor Grazing Act. These "Section 15" grazing lands are located in the six northern counties of the planning area, and are scattered among 7 million acres of private land, state land and land managed by other federal agencies.

The Proposed Resource Management Plan will supersede the 1979 Baker Management Framework Plan and the 1976 Grande Ronde Management Framework Plan. However, this RMP will not supplant the 1981 Ironside Rangeland Program Summary/Record of Decision (RPS), which was prepared for 379,357 acres in the planning area that are managed under Section 3 of the Taylor Grazing Act. These "Section 3" grazing lands are located primarily in Baker County and the portion of Malheur County within the planning area.

The Ironside RPS resulted from a thorough analysis conducted in the Ironside Grazing Environmental Impact Statement. It will continue to provide the basic grazing management and forage use direction for Section 3 grazing lands in the planning area. The Ironside RPS will be modified only to the extent that it is affected by other resource decisions stemming from this RMP.

The second periodic update to the Ironside RPS was attached to the draft RMP/EIS. The Ironside RPS Update describes the status of the grazing management program on Section 3 grazing lands in the planning area.

This Proposed RMP/Final EIS, in conjunction with the 1980 Ironside Grazing Environmental Impact Statement, is intended to satisfy for the Baker Resource area the court-ordered requirement (U.S. District Court for the District of Columbia, ref. case No. 1983-73) for site-specific grazing EISs on BLM administered grazing lands.

The Resource Management Planning Process

The Resource Management Planning Process involves nine interrelated steps, as shown in Table 3.

The Baker RMP was initiated in the winter of 1985, and the first six steps of the RMP process have been completed. Public involvement was solicited during planning steps numbers 1 and 2: the review of issues and development of planning criteria. Public review and comment was also requested during planning step number 5, when the resource area published draft resource management alternatives for public comment.

This document represents planning step number 7b, selection of the Proposed RMP/Final EIS, and is subject to a 30 day public comment period that closes November 10, 1986. The Final Resource Management Plan, Record of Decision and Rangeland Program Summary will be published in 1987.

US DEPARTMENT OF THE INTERIOR
Bureau of Land Management

VALE DISTRICT

Figure 1
General Location Map

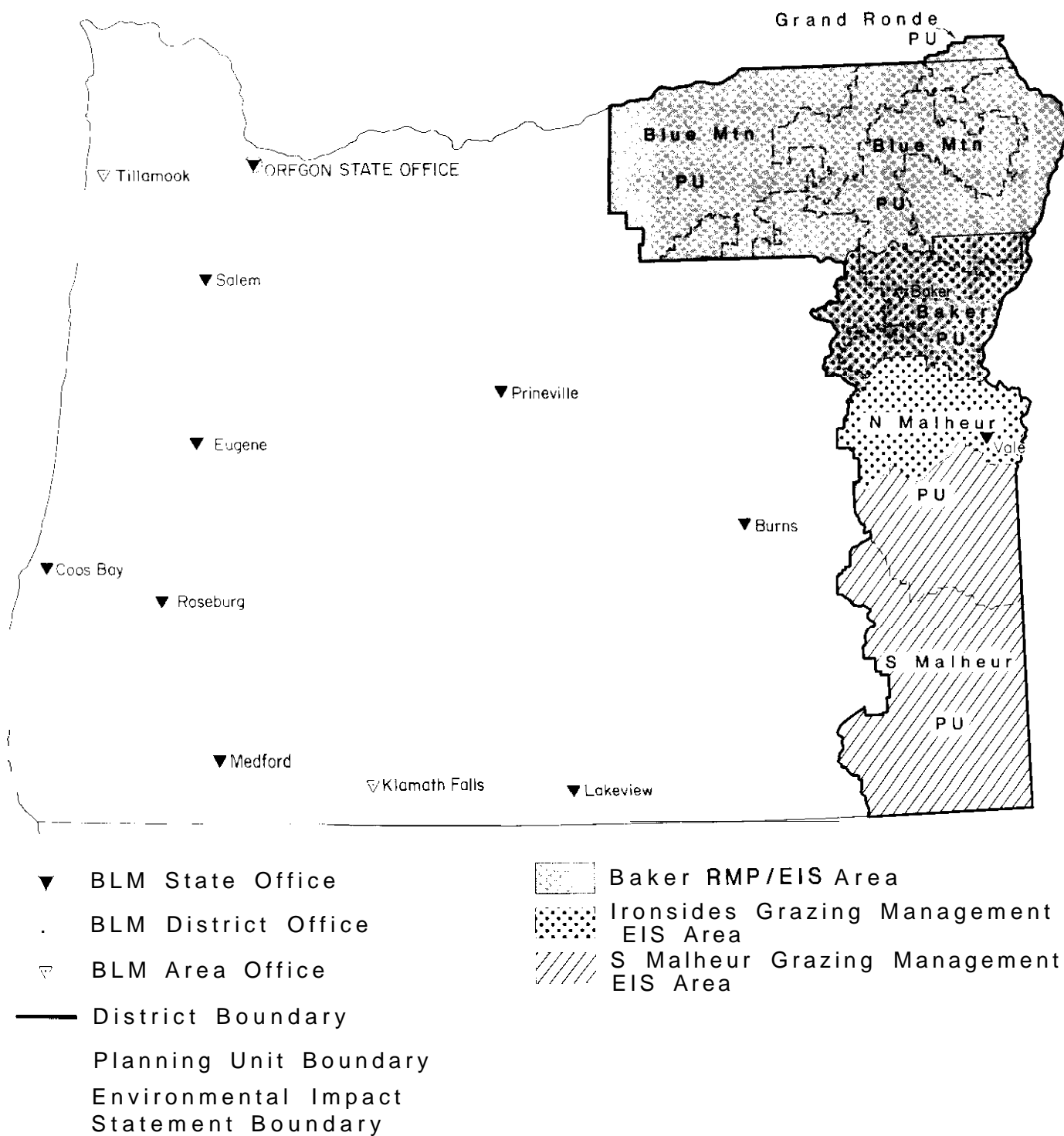


Table 3 Resource Management Planning Process

1. Identification of Issues	Completed
2. Development of Planning Criteria	Completed
3. Inventory Data and Information Collection	Completed
4. Analysis of the Management Situation	Completed
5. Formulation of Alternatives	Completed
6. Estimation of Effects	Completed
7. Selection of a Preferred Alternative	
a. Draft RMP/EIS	Completed
b. Proposed RMP/Final EIS	Completed
8. Selection of the Resource Management Plan/Record of Decision	Winter 1987
9. Monitoring and Evaluation	Continuing

Resource Planning Issues and Criteria

Public involvement was sought at an early stage in the RMP process to identify important issues that needed to be addressed by the management plan. A planning issue is an anticipated or known concern about the use or management of public lands or resources. Several specific issues were identified in public comments and by Baker Resource Area staff, and serve as the focus for this RMP/EIS.

After resource issues were identified, planning criteria were developed to guide how the issues would be addressed in the RMP. Planning criteria take into consideration resource laws, policies and regulations, and help the planning staff identify data needs, formulate land use alternatives, and evaluate and select a preferred alternative.

Following is a description of the primary planning issues and criteria considered in this RMP.

Topic: Lands and Access

Issue 1. Which lands in the resource area are suitable for disposal or acquisition to enhance management efficiency?

Planning Criteria:

- Identify lands that are difficult or uneconomical to manage because of scattered, isolated patterns/or insufficient resource values.
- Give emphasis to needs of other federal, state, and local government and communities for disposal lands.
- Assign priorities to land tenure adjustments,

Issue 2. Which lands need legal access to enhance their management and use?

Planning Criteria:

- Identify areas where access is lacking and areas where access is needed.
- Assign priorities to access needs

Issue 3. Which areas of public land would be suitable as right-of-way routes for major utilities, i.e., 69 KV or larger powerlines, 6-inch or larger pipelines, railroads, and improved and maintained roads?

Planning Criteria:

- Identify avoidance or exclusion areas,
- Designate corridor or corridor segments based on existing facilities.
- Designate communication sites (existing and proposed) that could be available for existing facilities.

Topic: Forest Management

Issue 1. Which forest lands and woodlands should be intensively managed for wood products and which should be managed principally to benefit other resources (i.e., watershed, wildlife, livestock grazing, etc.)?

Planning Criteria

- Classify forest lands according to their timber production capabilities.
- Consider other resource values as well as forest and woodland products.
- Give overmature, diseased, or insect infected woodland and forest land stands highest priority for management.
- Designate firewood cutting areas for public use (private or commercial).
- The level of timber and woodland production should not exceed sustained yield harvest capability.
- Assume all forest and woodland management practices will comply with state forest practice rules and meet water quality best management practices.

Topic: Mineral Resources

Issue 1. What areas of public land should be withdrawn from mineral entry?

Planning Criteria:

- Identify public lands with potential for development of locatable minerals.

Issue 2. In what areas should mineral leasing be encouraged?

Planning Criteria:

- a. Identify public lands that contain potentially valuable leasable mineral resources (i.e. coal, oil and gas).
- b. Review the special and no occupancy stipulation areas associated with the Vale District Programmatic Environmental Analysis and determine if they need revision for the Baker Resource Area.

Issue 3. In what areas should mineral materials be developed?

Planning Criteria:

- a. Identify areas suitable for management of mineral material disposal (i.e. decorative stone, rip-rap, sand and gravel, rock sources for aggregate, etc.), considering present and future demands and the needs of local governments and agencies.
- b. Identify areas where mineral materials are readily available from commercial suppliers and determine if sales from public lands within those areas should be limited.
- c. Review all material site rights-of-way in the Baker Resource Area for appropriate size and frequency of use. Also identify sites that would better serve the public as free use permits or community pits.
- d. Identify and prioritize mining disturbed areas for reclamation.
- e. Insure that reclamation meets federal and state requirements.

Topic: Rangelands

Issue 1. What should BLM's grazing management program be for lands managed under Section 15 of the Taylor Grazing Act, and located primarily in the Blue Mountain and Grande Ronde management areas (Morrow, Umatilla, Union, Wallowa, Garfield and Asotin counties)?

Planning Criteria:

- a. Allocate vegetation for livestock, wildlife, watershed protection, scenic quality, threatened and endangered species, and other multiple use considerations.
- b. Identify changes or additional range management practices needed to achieve other resource objectives identified in the RMP.

Topic: Recreation

Issue 1. In what areas should recreation activities be the predominant use, considering projected recreation demands within the area, visitor and resource protection

capability, public access, and compatibility with other uses?

Planning Criteria:

- a. Emphasize resource dependent recreation activities rather than those that are more dependent on facilities (except in areas of identified health and safety needs).
- b. Use visitor information/interpretation to enhance recreation experiences, promote safety, reduce user conflicts and protect resource values.
- c. Provide access to natural and recreational areas where appropriate.
- d. Consider the effectiveness of the current ORV plan and use designations, and if it should be changed to improve management.

Issue 2. How should the public land fronting the Grande Ronde River in Wallowa and Asotin counties be managed to protect the river's outstanding natural values?

Planning Criteria:

- a. Determine the need for developing or establishing access points.
- b. Consider the demand and use for the various resource uses on the river, given the need for protecting and maintaining the quality of the resource.

Topic: Special Management Area Designations

Issue 1. What areas on the public lands need special management attention to protect important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes, or to protect people from natural hazards?

Planning Criteria:

- a. Consider potential sites for designation as Areas of Critical Environmental Concern (ACEC), Research Natural Areas (RNA), or Outstanding Natural Areas (ONA).
- b. Identify areas having threatened and endangered plant and animal species, endemic vegetation communities, and important cultural, scenic, paleontological and wildlife resource values.
- c. Evaluate the potential for managing sites through multiple use constraint prescriptions as well as through designation.

Issue 2. How can the remaining segments of the Oregon Trail on public lands be protected?

Planning Criteria:

- a. Emphasize cooperative management with local and special interest groups.
- b. Give priority to information/interpretation facilities for protection of the trail.
- c. Evaluate potential for management through multiple use, special designations, and National Park Service management policy and plan recommendations.

Topic: Fire Management

Issue 1. Where, when and under what circumstances should BLM use prescribed fire through planned and unplanned ignitions as a management tool?

Planning Criteria:

- a. Coordinate all suppression, presuppression, and prescribed fire activities with other resource concerns to insure maximum benefit or protection.
- b. Identify areas where a suppression policy should be established, using criteria such as fuel types, resource values, access, ownership, and adjacent landowner policies (federal and state).
- c. Propose management of fires or initiation of prescribed burns to maintain natural ecosystems or to manipulate vegetation types.

Topic: Riparian Areas

Issue 1. How should BLM manage riparian zones on Section 15 grazing lands to benefit wildlife, fisheries, livestock grazing, visual resources, and water quality and quantity.

Planning Criteria:

- a. Identify riparian areas in need of management that affect anadromous fisheries and/or crucial wildlife habitat, livestock grazing and water quality.
- b. Recommend management practices that would protect maintain or enhance riparian zones.

Topic: Wildlife Habitat

Issue 1. How should BLM manage habitat to meet wildlife needs?

Planning Criteria:

- a. Identify important habitats, and their condition and carrying capacity.
- b. Classify lands according to their value as habitats.

c. Implement management systems in cooperation with the Oregon Department of Fish and Wildlife, Washington Department of Game or other agencies to protect, maintain and enhance habitats managed by BLM.

Chapter 2

Proposed Resource Management Plan

Introduction

Chapter 2 describes the Proposed Resource Management Plan, which is essentially the same as the Preferred Alternative identified in the Draft Baker Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS). The Proposed RMP provides for a balanced level of resource development, conservation and protection. It also best resolves issues raised during the planning process, satisfies the planning criteria, responses to public input, and mitigates the environmental consequences.

Approval of the Proposed RMP will mark the completion of one stage of the planning process. The RMP is not a final implementation decision on actions that require further specific plans, or decisions under specific provisions of laws and regulations. Additional specific plans or activity plans, such as habitat management plans (HMPs), will be done through the resource activity programs. Procedures and methods for accomplishing the objectives of the RMP will be developed through the activity plan. Further environmental analyses will be conducted, and additional engineering and other studies or project plans will be completed if needed.

Livestock Grazing Management

In the short term, grazing leases on Section 15 lands will continue to be issued at current levels, providing 4,258 AUMs. In later years, the level of grazing authorized on Section 15 lands will depend on the other resources values identified for these lands, and on which lands are ultimately recommended for disposal or retention. However, some adjustments could be made depending upon monitoring and rancher investments. (Refer to the Land Tenure section for more information on land retention and disposal).

The lessees could undertake range improvements consistent with BLM objectives and subject to specific approval by BLM. Range improvements will be periodically inspected for maintenance compliance.

The Ironside RPS will continue to be implemented on Section 3 grazing lands.

Relict vegetation areas identified by the Soil Conservation Service (SCS) will be protected to preserve these areas. Each site will be evaluated individually to identify the management necessary for protection. Management action could include fencing or grazing system adjustments. This effort will be coordinated with SCS.

Riparian Zone Management

Ten miles of uninventoried perennial riparian streams will be inventoried. Management programs for riparian zone recovery will be developed according to the following criteria:

1. location, size and significance of a riparian zone relative to its watershed;
2. current ecologic and scenic condition of a riparian zone relative to its potential;
3. whether a riparian zone is perennial or intermittent;
4. whether a riparian zone has potential for anadromous fish.

Recovery plans will put primary emphasis on state, federal and private cooperative efforts.

Management actions within Section 15 grazing area riparian zones will include measures to protect or restore natural functions (Appendix A), as defined by Executive Orders 11988 and 11992.

Wildlife and Fish Habitat Management

Wildlife habitat conditions will be maintained, or enhanced where opportunities are identified. The resource area will continue to work cooperatively with Oregon Department of Fish and Wildlife (ODFW) and Washington State Department of Game (WDG) to help achieve regional big game population objectives.

Habitat manipulation will be undertaken wherever needed to increase habitat diversity and quality to maintain a wide variety of game and non-game wildlife species. Wildlife improvement projects will include prescribed burns, small clearcuts, plantings, seedings, interseedings, fencing and streambank improvements.

Exclosures will be maintained or enhanced. Additional exclosures will be built in high value wildlife areas if alternative management practices of other resources do not improve habitat conditions within a reasonable amount of time.

Fish habitat improvements will be concentrated on streams in poor to fair condition. The Resource Area will emphasize cooperative efforts with other management agencies, especially to benefit anadromous fish habitat.

Inventories and monitoring will be increased as funding and manpower permits. Refer to the section on monitoring at the end of this chapter.

Habitat management plans will be developed for economically important wildlife, and threatened,

endangered and sensitive species in identified wildlife habitat areas. Wildlife habitat objectives will continue to be included in all resource activity plans (such as allotment management plans, forest management plans and fire management plans).

Reintroduction and introduction of endemic wildlife and fisheries species will be pursued in suitable habitats on public lands, in cooperation with the ODFW and WDG.

Existing cooperative agreements with ODFW and WDG on Cooperative Wildlife Management Areas will continue.

All forage within these Cooperative Wildlife Management Areas (approximately 350 AUMs) will be allocated to wildlife.

Threatened, Endangered and Sensitive Species Management

Locations of threatened, endangered (T&E), and sensitive species will be avoided through site-specific assessments and stipulations on proposed land disturbing activities. Inventories will be conducted for T&E and sensitive species. Habitat management plans will be written on habitat areas determined through the inventories. Management activities in the habitat of T&E or sensitive species will be designed specifically to benefit these species through habitat improvement or acquisition.

ODFW, WDG and/or the U.S. Fish and Wildlife Service (USFWS) will be consulted before implementing projects that could affect habitat for T&E or sensitive species. If a possible adverse impact on T&E species is determined through the BLM's biological assessment process, formal consultations with the USFWS would be initiated under Section 7 of the Endangered Species Act of 1973, as amended.

The existing platforms for ferruginous hawks will be maintained and monitored. New platforms will be installed, contingent upon funding. Suitable habitat for Columbian sharp-tailed grouse will be inventoried and the species could be reintroduced in cooperation with ODFW.

The cooperative Bald Eagle Management Plan for Unity Reservoir Nesting Bald Eagles will be continued. Winter and spring inventories on bald eagles, Swainson's and ferruginous hawks will be continued.

Land Tenure and Realty Management

Lands in the planning area will be placed in one of the following land tenure classification zones. Details for land tenure adjustment are contained in Appendix F.

1) Retention zone lands in the retention zone are those that best serve the management missions of BLM and have higher public value: including multiple use, management efficiency and public access to resources; or that have national, statewide or regional resource values. For example, lands that have significant values for threatened or endangered species, National Register cultural sites, wildlife habitat, riparian zones or mineral production were placed in the retention zone. These lands would generally be retained in public ownership. Most acquisition (primarily by exchange) would occur in this zone. No land sales would be permitted in this zone, however exchanges may be considered to acquire other retention zone lands that would enhance resource management programs or improve public service. The exception to land sales in the retention zone would be the existing landfills at Halfway, Richland, Unity and Baker, which would be transferred to these communities either by sale or exchange. A total of 411,447.14 acres of land is in this zone.

2) Disposal zone lands in the disposal zone are those that are inefficient to manage because of their small size or isolation, or that have no known or low resource values. These lands would be available for disposal pending site-specific analysis. If site-specific analysis determines that national, statewide or regional resource values exist, the land would be placed in the retention zone. A total of 18,306.86 acres is in this category. These lands are listed in Appendix F.

Legal access would be acquired primarily to benefit overall management and use of the resource. Access would be limited in areas where significant resource deterioration could result.

Major utilities would be encouraged to use existing designated corridors and sites shown on Map 6 in the Draft RMP/EIS. Corridor widths vary, but are a minimum of 2,000 feet. Sensitive resource values would be protected along corridors and sites, primarily through avoidance stipulations. Additional rights-of-way for local utility distribution or access to public lands would be authorized on a case-by-case basis when consistent with the RMP objective and allocations for the area. All rights-of-way applications will be reviewed to avoid a proliferation of separate, unnecessary rights-of-way.

Use authorization including FCMPA Section 302 permit/leases would be permitted on a case by case basis.

Public lands in areas of high public use or that have high potential to incur unauthorized use will be signed to the extent practicable with available funding.

Mineral Resource Management

Federal mineral estate lands not withdrawn from mineral entry will remain open and available for mineral development. BLM policy encourages development of public land mineral resources in a manner that satisfies national and local needs and provides for economically and environmentally sound exploration, extraction and reclamation practices.

Except where noted under Special Management Areas and Cultural Resources, no new protective withdrawals will be proposed and recommended to the Secretary of the Interior unless a resource cannot be protected or adverse effects mitigated through existing regulations.

All surface disturbance resulting from locatable mineral development will be regulated under the 43 CFR 3809 and 3802 regulations as set forth in Appendix A. Notices of noncompliance will be issued where operators fail to prevent unnecessary or undue degradation of the public land. In these instances BLM will require suspension of operation until compliance errors or violations are corrected.

Compliance inspections on all active mining exploration and development will be increased to two or more per year, contingent on funding. Inspections of operations in areas with resource values that have mandatory protection, such as habitat for T&E species or National Register-eligible sites, would be given the highest priority. Inspections of operations in areas with resource values such as riparian zones and fragile watersheds will be given the next highest priority. Environmental review of plans of operation will emphasize protective stipulations for natural and cultural values.

Unleased BLM administered mineral estate open to oil and gas leasing will be leased to qualified applicants. Proposed oil and gas development activities will be evaluated using the Vale District Programmatic Environmental Analysis. Geothermal lease applications will be evaluated by an environmental review prior to issuance of a lease.

About 75 percent of the Federal mineral estate managed by BLM will be open to leasing and development with standard stipulations (see Appendix A). Areas with important wildlife habitat will be open for leasing with restrictive seasonal stipulations. Three of the SMAs that will be designated under this alternative will be open for leasing with a "no surface occupancy" stipulation.

Of the 14,825 acres closed to leasing, 13,857 are located within the three wilderness study areas in the planning area. If these acres are not designated as wilderness, they will be categorized as open for leasing with restrictive seasonal stipulations to protect wintering bald eagles.

Common varieties of sand, gravel, stone and cinders will continue to be sold. Government entities and nonprofit organizations will continue to obtain mineral materials through free use permits. New quarry sites will be developed as needed, if they are consistent with protection of other resource values.

Material site rights-of-way will continue to be reviewed jointly with the Oregon Department of Highways. Those that are no longer needed will be revoked and reclaimed. Some may be replaced with free use permits.

Mineral material sales and free use permits will continue to be authorized from the existing community pit and other existing sites on a demand basis. In addition, as funds become available 24 potential community pit aggregate sites will be evaluated and production of mineral materials will be maximized consistent with demand and protection of other resource values.

As funds are available, tracts in the Troy Basin with lignite potential will be inventoried as part of the continuing resource inventory process.

Soils and Watershed Management

Watershed concerns will be the central issue addressed in site-specific planning for areas with fragile soils. All proposed resource projects and surface disturbance will be reviewed to ensure that soils/watersheds are protected, rehabilitated or improved. Disturbance on fragile soils will be minimized.

The Morgan Creek Watershed Management Plan will continue to be implemented. Additional watershed plans will be developed and implemented in conjunction with other resource activity plans.

Forest Management

A new forest inventory completed in 1985 redefined the sustainable harvest base acreage for the planning area. This revised base acreage will be used to determine the allowable harvest level for the next 10-year allowable cut period, which begins in 1988.

The 10-year sustainable harvest level will be approximately 27 Million Board Feet (MMBF) from a commercial forest land base of 25,353 acres.

Timber harvest will be excluded on approximately 673 acres of land recommended for Special Management Areas and on 3,304 acres that are considered to be economically non-operable.

Intensity of management for timber production will be adjusted on 3,914 acres to accommodate other significant resource values (e.g., clearcuts will be designed to

maintain proper forage/cover ratios, and only light shelterwood cuts will be performed in scenic vistas or on critical watersheds). This area includes 1,266 acres (5 percent of the total commercial forest land base) that will be managed to maintain stands containing all timber age classes to improve old-growth distribution for wildlife. Other resource protection measures will be utilized according to site-specific requirements. Even-aged management will be practiced on the remaining 21,437 acres through the use of clearcutting or shelterwood harvest systems.

Road closures and construction standards will depend on site requirements and anticipated future use as determined by forest management activity plans.

Site preparation, planting, and precommercial and commercial thinning will be conducted to maintain the allowable cut and benefit other resource values, particularly wildlife habitat and watershed.

About 4,000 acres of suitable woodlands will be excluded from harvest to protect mule deer winter range. The remaining 37,273 acres could be managed to produce an estimated sustainable 10-year harvest level of 9,800 cords of woodland products. However, demand sales of woodland products will be in areas where cutting would benefit other resources.

Fire Management

Fires that threaten personal property, improvements, or that would cause long term losses in resources will be suppressed as quickly as possible. A revised and comprehensive fire management plan will be prepared that emphasizes the use of prescribed burning and intensive management of unplanned ignitions to help meet ecosystem and habitat objectives. The Forest Service/BLM cooperative Elkhorn Fire Management Plan for the Hunt Mountain area will continue to be implemented.

Rehabilitation guidelines will be included in the fire management plan. Specific rehabilitation plans will also be prepared on a case-by-case basis.

Cultural Resource Management

Any ground disturbing projects or activities on BLM land, or authorized BLM action, will comply with Section 106 of the National Historic Preservation Act (as amended), Executive Order 11593, federal regulations (36 CFR 800, 36 CFR 60) and ELM manual directives for protection and management of cultural resources (see Appendix A). The State Historic Preservation Offices of Oregon and Washington and the National Advisory Council on Historic Preservation will be consulted. All National Register or

National Register eligible cultural properties will be protected and maintained.

Twenty-eight sites that are potentially eligible for the National Register will be enhanced through intensive management, such as stabilization, investigation and interpretation. The Oregon Trail on BLM land will be monitored annually. Management plans will be developed to protect the Oregon Trail. Twelve sites and two potential districts will be evaluated for nomination to the National Register.

Cooperative agreements for surveillance and patrol will be developed with other federal agencies to enhance protection of cultural resources outside Baker County.

Paleontological Resource Management

Paleontological resources will be maintained and protected through review of individual surface disturbing proposals. In addition, known sites will be evaluated and monitored regularly, and potential sites will be inventoried. A regional data review and evaluation of paleontological resources will be completed. The Unity Paleontological Area has been identified for further study as a potential special management area.

Recreation Management

The lower segment of the Grande Ronde River from the confluence of the Wallowa River to the Snake River, and portions of the Snake River and Joseph Creek, have been identified by the National Park Service in its Nationwide Rivers Inventory as suitable for study for wild and scenic values. The Bureau of Land Management recommends that these rivers be established as study rivers under Section 5(a) of the Wild and Scenic Rivers Act. Following establishment, BLM recommends that a study be authorized and completed to determine the suitability of these streams for inclusion in the National Wild and Scenic Rivers System. Should the study indicate the rivers, or segments thereof, to be suitable, Congress may designate them as wild, scenic or recreation rivers as appropriate.

A 33-mile segment of the Snake River, from the Forest Service boundary to Asotin, Washington, is a Section 5(a) Study River under the Wild and Scenic Rivers Act. The study for this river segment was completed by the National Park Service and submitted to Congress on April 26, 1985.

The BLM in the interim will protect the natural character of its lands along these rivers, pending determination of the rivers' suitability for designation.

Cooperative management of the Wallowa and Grande Ronde rivers with the U.S. Forest Service will continue. BLM will take a more active role in managing public lands along the river from a few miles upstream of Wildcat Creek to the confluence of the Snake River. A river management plan will be prepared to enhance the river's natural and recreation values. Also refer to the Special Management Area section of this chapter for management of the Grande Ronde as an ACEC.

Facilities at the Flagstaff Hill segment of the Oregon National Historic Trail Special Recreation Management Area (SRMA) will be maintained. A management plan for this SRMA will be prepared to enhance visitor use of the site. The resource area will continue to work with local interest groups on Oregon Trail management.

Existing facilities on Extensive Recreation Management Areas (ERMAs) could be redesigned, and measures will be taken to mitigate site overflow damage and sanitary problems associated with increased visitor use.

Where development is identified and funding is made available, additional facilities could be developed on sites that do not have significant conflicts with soil, watershed, riparian, aquatic or wildlife resources.

Public lands on the South Fork of the Walla Walla River could be leased under the authority of the Recreation and Public Purposes Act to Umatilla County for management as a recreation area in conjunction with Harris Park.

Off Road Vehicle Use

The ORV designations for Baker County and the South Fork of the Walla Walla River will remain in effect. In addition, the proposed Joseph Creek ONA will be designated as closed/limited and the other eight proposed SMAs will be designated as limited to designated roads and trails for ORV use. All other lands in the planning area (35,391 acres) will be designated as open to ORV use.

Special Management Areas

Under the proposed plan, nine possible special management areas totaling 38,988 acres will be designated and managed as ACECs; including the Joseph Creek ONA/ACEC and the Keating Riparian RNA/ACEC. Management plans will be developed and special management prescriptions will be implemented in all areas designated as SMAs, commensurate with available funding. Where needs are identified in specific management plans, fencing or signing may occur to protect unique natural and scenic values. Lands may be acquired to benefit and enhance resource values in special management areas. All existing cooperative

management agreements involving SMAs will be continued.

Ten areas were identified as requiring additional study. (Refer to Table 26 of the Draft RMP/EIS.) In cooperation with the Natural Heritage Programs of Oregon and Washington, all areas identified as needing study or special management will be evaluated to determine if they meet the criteria for ACEC designation. Appropriate interim protection measures will be implemented for areas that meet the criteria until formal designation, if appropriate, can be addressed in an RMP amendment.

Joseph Creek: Public lands on Joseph Creek (3,360 acres), between Tamarack and Cottonwood Creeks, will be designated and managed as an ONA/ACEC to protect natural qualities of the stream riparian zone, wildlife habitat, high scenic qualities, and outstanding geologic system values for educational and recreational purposes. Cooperation with the Washington Department of Game will continue to maintain and improve wildlife habitat in the Chief Joseph Wildlife Management Area. Wildlife habitat will be managed to improve forage and habitat requirements. Existing anadromous fish habitat will be maintained. Management plans will be developed to provide recreation opportunities compatible with protecting the natural riparian system on Joseph Creek. Land immediately adjacent to Joseph Creek will be closed to off-road vehicle use (150 acres); remaining lands will be limited to designated roads for off-road vehicle use. Incompatible uses will be excluded. A "no surface occupancy" restriction for oil and gas exploration and development will be applied. Timber harvest will be excluded on 80 acres of economically non-operable timber land. Riparian vegetation will be maintained or improved through intensive livestock management, which may include fencing. Lands may be acquired to benefit natural and wildlife values.

Grande Ronde: Public lands on the Grande Ronde River (9,715 acres) in Oregon and Washington, and on the Snake River in Washington, will be designated and managed as an ACEC to provide and enhance recreation opportunities, to promote protection and interpretation of the area's unique natural, scenic, geologic, ecologic, and cultural resource values; and to protect wildlife habitat. The visual resource will be protected within the viewshed corridor along the rivers. Only those uses compatible with maintaining visual resource classifications will be allowed. The area will be managed to maintain and provide habitat for bald eagles, raptors, game and non-game species, and anadromous fish in cooperation with federal and state agencies. A recreation management plan will be developed to protect natural and recreation values. Lands may be acquired to enhance wildlife habitat and recreational opportunities. A "no surface occupancy" restriction will be applied to oil and gas exploration or development. Off-road vehicle use will be limited to designated roads and trails.

Keating Riparian: BLM lands on Balm, Clover, and Sawmill Creeks (2,173 acres), in the Keating Valley area, will be designated and managed as an ACEC to protect riparian values and wildlife habitat. To protect and maintain natural riparian ecologic systems for research and educational purposes, a combination of 80 acres of Balm, Clover and Sawmill Creeks will be designated as an RNA. Incompatible uses in the RNA will be excluded, including livestock grazing and commercial timber harvest. A withdrawal from mineral entry will be pursued on 185 acres to protect the RNA. Compatible recreation uses will be permitted in the RNA. Riparian habitat will be maintained through intensive livestock grazing management or fencing to improve potential Columbian sharp-tailed grouse reintroduction habitat. Off-road vehicle use will be limited to designated roads and trails.

Powder River Canyon: Public lands in the Powder River Canyon (5,880 acres), between Thief Valley Reservoir and Highway 203 in the Keating Valley, will be designated and managed as an ACEC to protect raptor habitat, wildlife habitat, and to maintain scenic qualities while allowing for compatible recreation uses. The area will be managed to meet forage and habitat needs for big game, bald eagles and golden eagles, as recommended by the Oregon Department of Fish and Wildlife, and consistent with legislated authority. Incompatible uses within the canyon and adjacent upland will be excluded, including new road development. Good riparian conditions will be maintained by continuing intensive livestock management. A "no surface occupancy" restriction will be applied to mineral leasing and development. Off-road vehicle use will be limited to designated roads and trails.

Unity Reservoir Bald Eagle Nest Habitat: BLM lands on the North Fork of the Burnt River (360) acres, a potential bald eagle nest area, will be designated as an ACEC and managed to protect habitat consistent with the Endangered Species Act and Pacific States Bald Eagle Recovery Plan. Consistent with the Unity Reservoir Bald Eagle Management Plan, 200 of these acres will be designated and managed as an ACEC. The remaining 160 acres are under a Bureau of Reclamation project withdrawal for Unity Reservoir, and will also be managed to protect bald eagle habitat. Incompatible uses will be excluded, including firewood cutting, commercial timber harvest, and major development actions. Off-road vehicle use will be limited to designated roads and trails. Additional seasonal road closure restrictions may be applied. No new roads will be developed. Seasonal restrictions will be applied to oil and gas exploration and development.

Hunt Mountain: BLM lands on Hunt Mountain (2,230 acres) will be designated and managed as an ACEC to protect and maintain habitat for mountain goats and big game, and to protect habitat for sensitive plant species identified by the Oregon Natural Heritage Program. The

existing exclusion of livestock grazing will be continued. Timber harvest will be limited to prescriptions that promote wildlife and sensitive plant habitat. Off-road vehicle use will be limited to designated roads and trails.

Oregon Trail: Seven parcels of BLM lands with sites of the Oregon National Historic Trail (1,495 acres) will be designated and managed as an ACEC to preserve the unique cultural and visual qualities of these areas. Management plans for preservation, public information and interpretation will be developed. New uses incompatible with maintaining visual qualities or providing public interpretation will be excluded in a 1/2 mile corridor. A withdrawal from mineral entry under the mining laws will be proposed on about 200 acres of public land for trail sites at Flagstaff Hill, Straw Ranch, and Echo Meadows. Off-road vehicle use will be limited to designated roads and trails. Lands may be acquired to enhance recreational opportunities.

Sheep Mountain: BLM lands in the Sheep Mountain area (5,398 acres, between Pine Creek and Brownlee Reservoir), including a portion of the Sheep Mountain WSA, will be designated and managed as an ACEC to protect outstanding scenic qualities, wildlife and bald eagle habitat. Incompatible uses will be excluded, including harvest of economically non-operable timber. Seasonal restrictions for oil and gas exploration and development will be applied. Lands may be acquired to benefit bald eagle habitat. Off-road vehicle use will be limited to designated roads and trails.

Homestead: BLM lands on the Snake River Breaks near Homestead (8,537 acres, between Pine Creek and Nelson Creek) will be designated and managed as an ACEC to protect outstanding scenic qualities, and wildlife, bald eagle and sensitive plant habitat. Incompatible uses will be excluded. The area will be managed to meet forage and habitat requirements for game and non-game species, as recommended by the Oregon Department of Fish and Wildlife. Seasonal restrictions will be applied to oil and gas exploration and development. Off-road vehicle use will be limited to designated roads and trails.

The following three areas considered for special management will not be designated at this time. Existing legislation and authorities will provide protection of values, and the following management objectives will be applied.

Haplopappus Radiatus: All population localities of *Haplopappus radiatus* will be maintained and protected consistent with the Endangered Species Act. Studies will be implemented on known dispersed populations to evaluate the need for special management designation of a suitable locality as a Research Natural Area. Off-road vehicle use will be limited to designated roads and trails.

Little Lookout Mountain: BLM lands on Little Lookout Mountain will not be designated as a special management area. Management objectives will be to maintain current natural vegetation diversity and to maintain or improve riparian vegetation by intensive livestock management.

Big Lookout Mountain Aspen: BLM lands including dispersed aspen communities will not be designated as a special management area. A habitat management plan will be developed to provide habitat diversity for game and non-game species, including maintaining the viability of the aspen cover type through selective management practices. Off-road vehicle use will be limited to designated roads and trails.

Wilderness

The Bureau's Interim Management Policy for Wilderness Study Areas will continue to guide management in the three WSAs in the planning area. The possibility that these areas may be designated as wilderness will be recognized in all land and resource use decisions.

The recently designated McGraw Creek Wilderness Area will be managed by the U.S. Forest Service under cooperative agreement.

Visual Resources

Visual resources in the planning area have been classified according to BLM's visual resource management criteria. These criteria include scenic quality, visual sensitivity and viewing distance, and have resulted in the Visual Resource Management (VRM) classification shown in Table 18 and Map 5 of the Draft RMP/EIS. The four VRM classification define management objectives and the degree of visual change that will be acceptable within a landscape.

Noxious Weed Control

Infestations of noxious weeds are known to occur on some public lands in the planning area. The most common noxious weeds are diffuse, spotted and Russian knapweed, yellow starthistle, Canadian thistle, whitetop and yellow leafy spurge. Control methods will be proposed and subject to site specific environmental analyses. Control methods will not be considered unless the weeds are confined to public lands or control efforts are coordinated with owners of adjoining infested private lands.

BLM is preparing a supplement to its recent environmental impact statement on noxious weeds control on BLM lands in Oregon, Washington, Idaho, Montana and Wyoming.

Grasshopper Control

Grasshopper outbreaks occur periodically on and adjacent to public lands in the planning area. A 93,000 acre area that included 41,000 acres of public land was sprayed in 1985. During 1986, approximately 32,960 acres of public lands were treated.

The Animal and Plant Health Inspection Service USDA is preparing a new "Rangeland Grasshopper Cooperative Management Program Environmental Impact Statement". BLM will analyze impacts of grasshopper control on BLM land in a process tied to that EIS.

Withdrawal Review

Review of other agency withdrawals is expected to be completed in 1991, as required by the Federal Land Policy and Management Act of 1976, Section 204 (1). These withdrawals will be continued, modified or revoked. Upon revocation or modification, part of all of the withdrawn land may revert to BLM management. Current BLM policy is to minimize the acreage of public land withdrawn from mining and mineral leasing, and, where applicable, to replace existing withdrawals with rights-of-way leases, permits or cooperative agreements. Approximately 140,000 acres of land administered by other federal agencies will be involved in this withdrawal review.

Requirements for Further Environmental Analysis

Site specific environmental analysis of all proposed resource projects and activity plans is required by law and will be conducted under the proposed plan. Based on these environmental analyses, mitigation measures will be developed to resolve resource conflicts and prevent or minimize adverse impacts to resource values.

Environmental analyses and mitigation measures address all affected resources, including cultural values, wildlife and fish habitat, threatened, endangered and special status species, riparian habitat, and watershed and air quality concerns.

Monitoring the Baker Resource Management Plan

The Baker RMP will be monitored on a continuous basis to allow up-to-date evaluations and to be responsive to changing situations. Specific management actions arising from proposed activity plan decisions will be evaluated to ensure consistency with RMP objectives. The RMP will also be formally evaluated at intervals not to exceed 5 years. All plan monitoring will assess the following:

1. if management actions are resulting in satisfactory progress toward achieving objectives;
2. if actions are consistent with current policy;
3. if original assumptions were correctly applied and impacts correctly predicted;
4. if mitigation measures are satisfactory
5. if it is still consistent with the plans and policies of state and local government, other federal agencies, and Indian tribes;
6. if new data are available that would require alteration of the plan.

As part of plan evaluation, concerned government entities will be requested to review the plan and advise the District Manager of its continued consistency with their officially approved resource management related plans, programs, and policies. Advisory groups will also be consulted during plan evaluation in order to secure their input.

Upon completion of a periodic evaluation, or in the event that modifying the plan becomes necessary, the District Manager will determine what, if any, changes are necessary to ensure that management actions are consistent with RMP objectives. If the District Manager finds that a plan amendment is necessary, an environmental analysis of the proposed change will be conducted, and a recommendation on the amendment will be made to the State Director. If the amendment is approved, it may be implemented 30 days after public notice. A plan amendment may be initiated because of the need to consider monitoring findings, new data, new or revised policy, or a proposed action that may result in a change in the scope of resource uses or a change in the terms, conditions and decisions of the approved plan.

Potential minor changes, refinements or clarifications in the plan may take the form of maintenance actions. Maintenance actions incorporate minor data changes and are usually limited to minor refinements and documentation. Plan maintenance will not result in expansion in the scope of resource uses or restrictions or change the terms, conditions and decisions of the approved RMP. Maintenance actions are not considered a plan amendment and do not require the formal public involvement and interagency coordination process undertaken for plan amendments.

Activity Plan Monitoring

On-site inspection of activity plans (AMPs, HMPs timber sale proposals, etc.) and associated projects will be made periodically to determine if the objectives of the activity plans or projects are being achieved or if unacceptable or unanticipated impacts are occurring.

Monitoring systems for resource management programs (such as wildlife habitat, visual, cultural or recreation) will be developed and implemented as committed in the record of decision.

A key indicator concept of monitoring will be utilized to determine what change agents are to be monitored for each action plan. An interdisciplinary team of resource specialists will identify the change agents to be monitored and the required inspection frequency.

A district-wide implementation record of all ongoing activities and associated monitoring activities will be maintained in the Vale District Office and Baker Resource Area Office. This record will help to determine monitoring obligations and annual work plan commitments.

Water quality monitoring is usually carried out in accordance with executive orders, specific laws, and BLM Manuals.

Vegetation monitoring will be done in accordance with this proposed Resource Management Plan "Rangeland Monitoring In Oregon and Washington", and the "Vale District Monitoring Plan".

Chapter 3

Text Revisions

Significant additions, revisions and corrections to the Draft Baker Resource Management Plan and Environmental Impact Statement (RMP/EIS) are presented in this chapter. The page numbers that appear in bold print indicate the page of the Draft RMP/EIS on which the revision or correction would appear if the entire EIS were being reprinted. Significant revisions have been made to the Appendices on Standard Design Features (Appendix G in the DEIS), and Land Tenure Adjustment Criteria (Appendix I in the DEIS). The appendices are reprinted in their entirety and now listed as Appendixes A and F respectively. Table II Threatened, Endangered and Sensitive Species and Table 36 Impacts to Air Quality have also been revised and are reprinted as Appendixes C and D in this Document. Two new appendices have been added, B-Water Quality Measurements and E Proposed Mineral Withdrawals.

Page 7 Under Federal Agencies, insert the following paragraph after paragraph three.

The BLM and FS have several interagency agreements regarding minerals management on lands administered by the FS. The BLM also has interagency agreements on minerals management with other Federal agencies, such as the Bureau of Indian Affairs. However, the management of minerals on lands administered by other Federal agencies is not addressed as part of this RMP.

Page 8 Table 4 should be revised as follows:

3. Little Sheep Cr..Wallowa..Mule Deer/Upland Game..540..30..470..40

Page 8 Under State and Local Governments, insert the following paragraph after paragraph three.

The Oregon Department of Geology and Mineral Industries (DOGAMI) and BLM have a memorandum of understanding (MOU) covering development of geothermal resources, conservation of oil and gas, and mined land reclamation on federal lands administered by BLM in Oregon. Through the MOU, DOGAMI and BLM work closely to avoid duplication in regulations, inspections and approval of reclamation plans, and attempt to minimize repetitive costs to miner/operators, the public, and both State and Federal Governments. The goal of the MOU is to ensure proper development and conservation of nonrenewable mineral resources and proper protection and reclamation of lands in Oregon.

Page 10 5. Relationship to Tribal Treaties

Add the following to paragraph: The BLM will contact and consult with the appropriate tribal representatives and BIA agencies in the early stages of project or activity planning that may affect tribal interests, treaty rights, or traditional resource areas within ceded tribal lands.

Page 12 Under Air Quality

The third paragraph first sentence should read: Two Class I airsheds occur within the Baker Planning Area: the Hells Canyon Wilderness Area and the Eagle Cap Wilderness Area,

Page 13 Under Threatened, Endangered, Sensitive and Special Status Plant Species, the first paragraph should be revised as follows:

Thirty-two plant species listed as endangered, threatened or sensitive in Oregon by the Oregon Natural Heritage Data Base are known or are suspected to occur in the planning area. These are listed in Table 11. Of these, 15 plant species are either candidates for Federal listing or are currently listed (1985 Federal Register).

Page 14 Table 10 should be revised as follows:

Wildcat Creek. 2 2 2 S
Wallupa Creek. 2.552 5.....2.5.....S
Total 50.. .40.....15.5..21..6.

Page 15 Table 11 has been substantially revised and is reported in Appendix C of this document.

Page 16 Table 13 should be revised as follows:

Poles 5.0-8.9 ... 11-40' ... less than 40% 2082

Page 23 Table 17 should be revised as follows:

Total 216,000

Page 25 Table 18 should be revised as follows:

Total 428,172 100

Page 25 The last sentence under the Special Management Areas section should be revised as follows:

Refer to Table 26 for a description of possible SMAs and Map 6 for SMA locations.

Page 25 Under Population, Income and Employment Paragraph 3, first sentence should read:

Estimates of personal income and employment generated from activities on public land managed by the BLM in the planning area are displayed in Table 21.

Page 26 Table 20 should be revised as follows:

Mining D 0 0....L L....D

Page 45 Table 33 should be revised as follows:

Preferred 410,111.20 8,901.77 10,741.08

Page 61/62 The section, Impacts to Air Quality. should be revised as follows:

Smoke produced from prescribed burning of slash and prescribed burns to improve wildlife habitat would be less than the smoke produced from similar burning during the baseline year of 1978. Less smoke from slash burning would be accomplished by burning smaller, wetter fuels and by burning more piles. Also contributing to less fuels on a slash burning are cleaner harvesting techniques and firewood programs.

The Oregon Visibility Program Plan was designed to maintain or improve visibility in Class I airsheds, especially during the high visitor-use period of July 4-Labor Day. Two Class I areas (Hells Canyon and Eagle Cap Wilderness areas) are within the planning area. Although plume blight or visibility impairment due to prescribed fires are not expected to occur within the Class I areas, burning will be planned for spring or fall, as much as possible, to avoid the July 4-Labor Day period. In addition, all prescribed fire plans will address Class I areas in the Smoke Management Section, and all prescribed fires will occur when transport winds will not carry smoke into Class I areas.

Smoke due to slash burning and prescribed burning would be greatest under the Natural Environment Protection Alternative (see Table 36). Less smoke would be produced under the Preferred Alternative and the least amount would be produced under the Commodity Production Alternative.

Timber harvest from BLM lands in the planning area is less than 1 percent of all other sources combined. With appropriate mitigation measures, it is doubtful that the differences between the alternatives would be noticeable during most years.

Page 62 Table 36 has been substantially revised and is printed in Appendix D of this document.

Page 67 The paragraph on Leasable Minerals should be revised as follows:

Stipulations on oil and gas leasing would occur under all alternatives except the Current Management Situation Alternative (see Tables 34 and 37). The Commodity Production Alternative would have the least impact on mineral production potential. The greatest impact would occur under the Natural Environment Protection Alternative, with 12 proposals for SMAs, and slightly less under the Preferred Alternative, with 9 proposals for SMAs.

Page 68 Table 38 should be revised as follows:

Balm Cr RNA/ACEC	1073	75	75
Sheep Cr ACEC	947	9	4 7
Sawmill Cr RNA/ACEC	420	420	80 80
Clover Cr RNA/ACEC	680	680	30 30
Oregon Trail ACEC	1495	1495	1495 200.29
Total Proposed Acres of NSO or Withdrawal			
	3360	34,508	1680 18,955 385.29

Page 71 Under Federal Agencies, the fifth line should read U.S. Environmental Protection Agency.

Page 78 Add the following to the references cited:

Moore, B.N. 1937, Nonmetallic Mineral Resources of Eastern Oregon. U.S. Geological Survey Bulletin 875, 180 P.

Page 79 Add the following terms and definitions to the Glossary

No Surface Occupancy (NSO) The oil and gas lease stipulations that prohibits any surface use of the Lease

Seasonal Stipulation-the oil and gas lease stipulation that restricts surface use of the lease during a specified period of the year.

Chapter 4

Consultation & Distribution

The Baker RMP/EIS was prepared by an interdisciplinary team of specialists from the Baker Resource Area and Vale BLM District Office. Writing of the RMP/EIS began in January 1985. The RMP/EIS process included public participation, interagency coordination, and preparation of a management situation analysis (on file at the Baker Resource Area Office). Consultation and coordination with agencies, organizations and individuals occurred throughout the planning process.

Public Involvement

A notice was published in the Federal Register and local news media in March 1985 to announce the formal start of the RMP/EIS planning process. At that time a planning brochure was sent to the public to request further definition of issues within the planning area. An opportunity was provided to submit comments on proposed criteria to be used in formulating alternatives.

In October 1985 a notice of document availability was published in the Federal Register and in the local news media for the Baker Resource Management Plan Proposed Land Use Alternatives brochure. An outline of proposed alternatives, major issues, and revised planning criteria were included in this document. Three alternatives ranged from emphasis on production of commodities to an emphasis on enhancement of natural values, with a middle ground alternative attempting to provide a balance

between the two. The fourth alternative reflected a continuation of existing management. The proposed alternatives brochure contained a map showing land status, commercial forest land, wildlife habitat and potential special management areas. The alternatives brochure generated 20 public comments.

On March 28, 1986, a notice of document availability was published in the Federal Register and in local news media for the Draft Baker RMP/EIS. Public meetings were held in Asotin, Washington on May 27, 1986; Heppner, Oregon on May 28, 1986; Baker, Oregon on June 3, 1986; Pendleton, Oregon on June 4, 1986; La Grande, Oregon on June 5, 1986; and Enterprise, Oregon on June 18, 1986 for the purpose of discussing the document and answering public concerns. The Draft RMP/EIS was also discussed with the District Advisory Council on April 30, 1986. The Draft RMP/EIS was presented to the following County Commissioner Courts: Morrow County on May 28, 1986; Umatilla County on June 4, 1986; Union County on June 4, 1986; and Baker County on June 18, 1986. Asotin and Wallowa Counties declined the invitation for a discussion and instead elected to offer written comments if necessary.

Agencies and Organizations Contacted or Consulted

The RMP/EIS team contacted or received input from the following organizations during the development of the RMP/EIS.

Federal Agencies

U.S.D.I. Bureau of Indian Affairs
U.S.D.E. Bonneville Power Administration
U.S.D.I. Bureau of Mines
U.S.D.I. Bureau of Reclamation
U.S.D.I. Environmental Protection Agency
U.S.D.I. Fish and Wildlife Service
U.S.D.A. Forest Service
U.S.D.C. National Oceanic and Atmospheric Administration
U.S.D.I. National Park Service
U.S.D.A. Soil Conservation Service

State and Local Governments

State of Oregon
Department of Environmental Quality
Department of Forestry
Department of Geology & Mineral Industries
Department of State Lands
Department of Fish and Wildlife
Department of Transportation, State Parks, & Recreation Division
Department of Water Resources
Executive Department
Historic Preservation Officer
State Marine Board

State of Washington
Department of Fisheries
Department of Game

Oregon Counties
Baker County Commissioners
Grant County Commissioners
Malheur County Commissioners
Morrow County Commissioners
Umatilla County Commissioners
Union County Commissioners
Wallowa County Commissioners

Washington Counties
Asotin County Board of Commissioners
Garfield County Board of Commissioners

Organizations

Atlantic Richfield Company
Associated Oregon Loggers

Oregon Natural Heritage Data Base
Oregon California Trails Association
Oregon State Extension Service
Oregon Trails Tourism Council
Range Ecology Group
Sage Association
The Nature Conservancy
Union County Izaak Walton League
Wild Canyon Cattle Co., Inc.

List of Agencies, Persons and Organizations to Whom Copies of the RMP/EIS Have Been Sent.

Federal Agencies

U.S. Department of Agriculture
Forest Service
Pacific Northwest Forest & Range Experiment Station
Pacific Northwest Research Natural Area Forestry Science Lab
Soil Conservation Service

U.S. Department of Commerce
National Marine Fisheries Service
National Oceanic & Atmospheric Administration

U.S. Department of Defense
Army Corps of Engineers

U.S. Department of Energy
Bonneville Power Administration
Federal Energy Administration
Federal Energy Regulatory Commission

U.S. Department of the Interior
Advisory Council on Historic Preservation
Bureau of Indian Affairs
Bureau of Mines
Bureau of Reclamation
Fish & Wildlife Service
Geological Survey
Natural Resources Library
Office of Public Affairs

U.S. Environmental Protection Agency

U.S. Federal Aviation Administration

National Marine Fisheries Service

National Weather Service

Pacific Northwest River Basins Commission

State and Local Governments

State of Oregon

Department of Agriculture & Resource Economics

Department of Forestry

Department of Environmental Quality (DEQ)

Department of Fish and Wildlife

Department of Geology & Minerals Industry

Department of Land Conservation & Development (LCDDC)

Department of Range & Resources

Department of Transportation, Parks & Recreation Division

Department of Water Resources

Division of State Lands

Executive Department A-95 Clearinghouse,

Intergovernmental Relations Division

Governor

Historic Preservation Officer

Soil & Water Conservation Commission

State Marine Board

State Scenic Waterways

State Water Resources Board

Oregon Counties

Baker County Extension Service

Baker County Planning Commission

Grant County Commissioners

Harney County Commissioners

Malheur County Commissioners

Malheur County Extension Agent

Morrow County Commissioners

Morrow County Extension Agent

Morrow Soil & Water Conservation District

Union County Agent

Union County Commissioners

Umatilla County Agent

Umatilla County Commissioners

Umatilla County Planning Department

Wallowa County Agent

Wallowa County Commissioners

State of Washington

Department of Fisheries

Department of Game

Department of Natural Resources

Governor

State Parks & Recreation Commission

Washington Counties

Asotin County Agent

Asotin County Board of Commissioners

Garfield County Board of Commissioners

State of Idaho

Department of Fish & Game

Local Governments

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of Warm Springs

Nez Perce Tribal Executive Committee

Warm Springs Tribal Commission Planning Department

Interest Groups & Organizations

1000 Friends of Oregon

American Alpine Club

American Fisheries Society

American Forest Institute

American Horse Protection Association

American Mining Congress

AMOC Minerals Company

Anaconda Company

Associated Oregon Industries

Associated Oregon Loggers, Inc.

Association of Oregon Archaeologists

Atlantic Richfield Company

Audubon Society

Baker County Cattlemen's Association

Blue Mountain Forest Products

Boise Cascade Corporation

Chevron Resource Company

Columbia River Intertribal Fish Commission

Continental Oil Company

Crown Zellerbach

Defenders of Wildlife

Desert Trail Association

Eastern Oregon Forest Protection Association

Eastern Oregon Mining Association

Eastern Oregon Sportsman

Ellingson Timber Company

Field and Stream

Friends of the Earth

Geothermal Resources International

Grand Canyon Doves, Inc.

Hines Lumber Company

Homestake Mining Company

Idaho State Historical Society

Independent Petroleum Association of America

Industrial Forestry Association

Izaak Walton League of America

Keep Oregon Green Association

League of Oregon Women Voters

Malheur Country Historical Society

Mazamas

Mineral Exploration Coalition

National Wildlife Federation
Native Plant Society of Oregon
Natural Mustang Association
Natural Resource Defense Council
Northwest Environmental Defense Center
Northwest Mining Association
Northwest Pine Association
Northwest Power Planning Council
Northwest Timber Association

Occidental Minerals Corporation
Oregon Association of Counties
Oregon California Trails Association
Oregon Cattlemens Association
Oregon Council of Rock & Mineral Clubs
Oregon Environmental Council
Oregon Farm Bureau Federation
Oregon 4-Wheel Drive Clubs
Oregon Historical Society
Oregon Hunters Association
Oregon Mineral Council
Oregon Mining Association
Oregon Natural Resources Council
Oregon Packers&Guides Association
Oregon Sheep Growers
Oregon State University
Oregon State University Extension Service
Oregon Trail Tourism Council
Oregon Wildlife Federation

Pacific Logging Congress
Pacific Northwest 4-Wheel Drive Association
Pacific Power& Light Company
Public Lands Council
Public Lands Institute

Range Ecology Group
Rocky Mountain Oil and Gas Association

Sage Association
Sage Country Alliance for Good Government
Sierra Club
Society for Range Management

The Nature Conservancy
The Wilderness Society
The Wildlife Society
Treasure Valley Rock&Gem Club

Union County Izaak Walton League

Western Forest Industries Association
Western Land Exchange Company
Wild Canyon Cattle Company, Inc.
Wildlife Management Institute

Approximately 900 additional individuals and organizations that expressed an interest in public lands in the planning area were also sent copies of the RMP/EIS. Included in this group are all grazing lessees within the

planning area, members of the State legislature, U.S. Congressional delegation, various educational institutions, and radio, newspaper and television media,

Consistency Review

The State Director has concurrently submitted this plan to the Governors of Oregon and Washington and requested that they identify any known inconsistencies with State or local plans, policies or programs. The Governors will have 60 days in which to identify inconsistencies and provide recommendations in writing to the State Director. The consistency of the plan with the resource related plans, programs and policies of other Federal agencies, State and local government and Indian tribes will be re-evaluated in the future as part of the formal monitoring and periodic evaluations of the plan.

Comment and Protest Procedures

If you wish to make comments for the District Manager's consideration in the development of the decision, please submit your comments by November 10, 1986 to the District Manager, Vale District Office. The plan decisions will be based on the analysis contained in the EIS, additional data available, public opinion, management feasibility, and policy and legal constraints.

Any person that participated in the planning process and has an interest that is or may be adversely affected by approval of the Proposed RMP, may file a written protest with the Director of the BLM. Protests should be sent to the Director, Bureau of Land Management, 18th and C Streets NW, Washington D.C. 20240 by November 10, 1986. The protest shall contain the name, mailing address, telephone number, and interest of the person filing the protest; a statement of the issues being protested (raising only those issues that were submitted during the planning process by the protesting party, or an indication of the date the issues were discussed for the record); and a concise statement explaining why the decision is believed to be wrong.

The Director shall render a prompt written decision on the protest setting forth the reasons for the decision. The decision shall be sent to the protesting party by certified mail and shall be the final decision of the Department of the Interior.

Public Comment on the Draft RMP/EIS and Responses to Comments

This section of the Proposed RMP/Final EIS contains a copy of written comments provided by the public on the Draft RMP/EIS. Each substantive comment is numbered for identification. BLM responses immediately follow each of the letters.

Comment letters received on the Draft Baker RMP/EIS are listed below:

1. Bill Rudolph
2. Oregon Historical Society
3. City of Echo, Oregon
4. U.S.D.A., Forest Service, Region 6
5. Pete Wyman
6. Richard R. Gass
7. R.A. Hunt
8. Oregon Department of Geology and Mineral Industry
9. Oregon Department of Land Conservation and Development
10. Oregon Department of Forestry
11. U.S.D.I., National Park Service
12. Ellingson Lumber Company
13. Oregon Department of Environmental Quality
14. Oregon Department of Agriculture
15. U.S. Department of Commerce
16. U.S.D.A., Soil Conservation Service
17. U.S. Environmental Protection Agency
18. The Nature Conservancy
19. George R. Schlegel
20. John R. Swanson
21. Sierra Club and Friends of Whitewater
22. U.S.D.A./Forest Service, Pacific Northwest Research Station
23. Oregon Hunters' Association, Baker County Chapter
24. Powder River Sportsmen's Club
25. Joann Benson
26. Oregon State University, Extension Service
27. Craig Markham
28. Oregon-California Trails Association
29. Tye One on Flycasters
30. Rick Georges
31. Boise Cascade
32. Oregon Department of Fish and Wildlife
33. Oregon Natural Resources Council
34. Range Ecology Group
35. U.S.D.D. Army Corps of Engineers
36. Blue Mountain Protective Alliance
37. Oregon Department of Transportation, Parks and Recreation Division

1

4/22/86

The Jack Albright

As a public land user, I would like my comments noted on the Baker Resource Management Plan - Environmental Impact Statement.

I feel with the facts given in your March 1986 Draft that the Natural Environment Protection Alternative benefits the most people now and in the future.

I can see a great many hours of time and work in the information you have sent me. I do not completely agree with the reasoning for keeping the cattle allotments. They benefit a few isolated individuals while creating a tremendous cost to the environment and taxpayer.

Sincerely,
Bill Kuehlph
695 Place
Baker, Oregon 97701

RECEIVED

APR 23 1986

BUREAU OF LAND MANAGEMENT
CAREER, OR

2 OREGON HISTORICAL SOCIETY

1230 S.W. Park Avenue
(503) 222-1741



Portland, Oregon 97205
Cable: Histore

May 1, 1986

Mr. Jack Albright, Area Manager
Baker Resource Area Office
1550 Dewey
Baker, Oregon 97814

Dear Mr. Albright:

I am writing to strongly endorse the Preferred Alternative for managing public lands in the Baker Resource Area, as set forth in the draft Environmental Impact Statement of March 1986.

We do not feel that any of the other alternative proposals provide sufficient safeguards for the irreplaceable historical and cultural value of the sections of the Oregon Trail traversing this area and the 28 potential National Historic sites also located in this area. Annual monitoring and management planning are two important ways to ensure that the Oregon Trail not be driven flat, kicked down and otherwise slowly but surely lost forever as a reminder of the persistence of our country's early settlers. We should be equally persistent in protecting our priceless heritage.

Sincerely,

Thomas Vaughan
Executive Director

TV:cw

cc: David G. Talbot, State Parks and Recreation Division, Salem
David W. Powers, State Historic Preservation Office, Salem

RECEIVED

MAY 05 1986

Units which are now incorporated: The Battleground Oregon Museum, North Pacific (Jenkins) and
Bureau of Land Management
Northwest Conservation Center, Oregon Geographic Names Board, Oregon Landmarks Commission, CAREER, OR
Oregon Lewis and Clark Heritage Foundation

2-1 We agree with your concerns for the Oregon Trail. Under the direction of this BLM, site-specific recommendations will be developed to guide management of individual segments of the Oregon Trail that occur within the planning area.

3



CITY OF ECHO

P.O. Box 9
Echo, Oregon 97426
Phone (503) 376-8411
May 6, 1986

Jack Albright
Area Manager
Baker Resource Area Office
1550 Dewey
Baker, OR 97814

RE: Echo Meadows Trail Section

Dear Mr. Albright:

I am responding on behalf of the City of Echo and Oregon Trail Tourism Council regarding the March 1986 Baker Resource Management Plan in regard to the Echo Meadows Oregon Trail Section. As indicated in our meeting with BLM representatives last winter, OTTC and the city would be happy to work closely with your agency to preserve, protect and enhance the Oregon Trail as a tourist site. We fully support the scenario outlined on page 53 of the report regarding the Echo Meadows and Oregon Trail sites as a whole.

- 3-1 Our group would like to see limitation of off-road vehicles in the area do to the damage they can do to the trail ruts. We also would like to see public access secured and eventually see an interpretive area developed with some type of hiking path, so that the delicate balance of the land management is not disturbed to the point that the area begins to form sand blows. However public access so that tourists, school children and other interested individuals can see and appreciate the trail must be secured.
- 3-2
- 3-3 We would also be willing to seek funding for the interpretive project, if we know that the BLM would be interested and if we know what requirements and mechanics would be involved in implementing such funding.

Sincerely,

[Signature]
Diane Berry
City Administrator
OTTC Secretary

cc: John Bennett
Byron Grow
Mary Oman

RECEIVED

MAY 07 1986

BUREAU OF LAND MANAGEMENT
Baker, OR

4



United States Forest Service
Department of Agriculture

RO

Reply to: 1920

Date: May 9, 1986

Subject: Baker Resource Management Plan

To: Area Manager, Baker Resource Area
Bureau of Land Management
P.O. Box 987
Baker, OR 97814

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Baker Resource Management Plan. We support the recommended alternative for managing the Baker Resource Area without reservation, and foresee no conflicts with adjacent National Forest management.

We have the following comments which are primarily editorial:

Page 12: Air Quality

Within the Hells Canyon National Recreation Area (NRA), only the Hells Canyon Wilderness is classified as a Class I airshed. The remainder of the NRA is Class II.

Page 14: Table 10

Several of the totals in the table appear to be incorrect.

Page 16: Table 13

4-1 The total acreage figure is apparently incorrect.

Page 23: Table 17

The total visitor days figure is apparently incorrect.

Page 25: Population Income and Employment

Apparently, the public lands referred to only involve those under BLM Administration.

Page 25: Table 18

The total acreage appears to be incorrect.

RECEIVED

MAY 13 1986

BUREAU OF LAND MANAGEMENT
Baker, OR



FS 6200-281-021

- 3-1 Off-road vehicles will be limited to designated roads and trails near BLM-managed segments of the Oregon Trail that occur in the planning area.
- 3-2 Public access is currently being sought for the Echo Meadows Oregon Trail Section. A management plan for the Oregon Trail, where it crosses public land in the planning area, will be developed to address each site-specific management need.
- 3-3 Cooperative management, including cooperation in funding, is encouraged for implementing site-specific plans on the Echo Meadows section of the Oregon Trail.



Area Manager, Baker Resource Area

Page 33: Visual Resource

4-2 You may want to examine the effects of varying the Visual Resource Management direction between alternatives since it is not a legal requirement.

Page 66: Table 37

Total increase for limited entry in the preferred alternative appears to be incorrect.

4-1 Page 68: Table 38

We found the table to be confusing as some of the special management areas total acres are not accounted for in any of the alternatives; e.g., Balm Creek, Sheep Creek, Sawmill Creek, and Clover Creek.

No. 3. The elk feeding station near the confluence of Anthony Creek and the North Powder River is not shown on the map.

4-3 Our records indicate some differences in the key seasonal big-game range. I suggest you contact the Wallows-Whitman National Forest Supervisor's Office in Baker to compare inventory data.

No. 1. Refers to USFS Lands. Should correctly be termed National Forest, or National Forest System land.

Ironside Rangeland Program Summary Update Map: Refers to US Forest Service Land which should correctly be the same as Map No. 1 above.

[Signature]
JAMES F. TORRENCE
Regional Forester



FS 6200-281-021

4-1 Chapter Three, Text Revisions, contain the text corrections identified in this letter.

4-2 Because of the unaltered pattern of the public lands, opportunities were missed in revising the Natural Resource Management Plan among the alternatives. Natural Resource Management was prioritized differently for management emphasis in the alternatives (See Appendix F in the Draft RMP/EIS).

4-3 We acknowledge the map errors and have corrected our data. However, the maps won't be reprinted due to funding shortages.

5

Pat E. Wiman
Rt. 5, Box 309
Spokane, WA 99208

Baker Resource Area Office
1950 Dewey
Baker, Oregon 97814

RECEIVED
MAY 14 1986

BUREAU OF LAND MANAGEMENT
DENVER

Subject: Baker Resource Management Plan, DEIS

I have been a "user" of the Baker Resource Area for years for photography, floating the Grande Ronde, hunting, fishing, etc.

The plan doesn't suffer from a wide range of imaginative options but maybe there are not many options available. The differences between the Preferred Alternative and the Natural Environmental Alternative are minor. Since the Preferred Alternative is supposed to be protecting natural values and also long term resource values, it seems to me that the Natural Environmental Alternative would make more sense to pick the Natural Resource Protection Alternative.

The difference between the Preferred (PA) and the Natural Environment in AUM is, less the 1% of the AUM's. The mass destruction of soils, archeological sites, and riparian areas by sloppy BLM mismanagement is well documented by the BLM, the agency, and others. But why does the PA not exclude livestock from the 6 miles of stream etc., to protect riparian areas? Certainly not for the economics of saving 2% cows, a pretty economic analysis of grazing. There is nothing to suggest that the BLM is doing a good job of protecting the riparian areas. Justification given for the current grazing levels, let alone why maximum natural values should not be protected.

The Natural Alternative should be implemented. Riparian protection should be of paramount concern to the BLM. It is certainly the number one concern of the public according to a USFS survey. The first two paragraphs under Wildlife Management (pg. 54) appears to be too general. There is no reason since the values appear greater than livestock grazing. Since the no data a history of riparian areas and riparian areas should be protected. The condition of the land and the commodity value of resources are negligible. There appears no reason not to protect maximum soils, watershed and old growth resources as under the Natural Environmental Protection Alternative.

The Special Management Areas recommendations in the Natural Environment should be accepted. In particular, the Grand Ronde River should have maximum protection as an outstanding wild or scenic river. The entire river canyons need protection. What incompatible use could possibly have a greater economic

Pat E. Wiman

5-1

This plan does not propose any livestock benefiting projects and therefore no benefit/cost analysis was presented in the Draft RMP/EIS. Discussion of grazing fees, which are set by legislative formula, is beyond the scope of this FIS. The Draft RMP/EIS considers grazing allocations only in Section 15 Grazing lands. See the Purpose and Need (page 2) and alternatives eliminated from detailed study on page 29 in the Draft RMP/EIS for a discussion of Section 15 Grazing. Also see response 28-1.

5-2

The proposed plan calls protection of riparian zones high (see Appendix F, of the Draft RMP/EIS) compared to other resources. The Resource Area will develop activity plans to provide site-specific management direction for riparian zones that are not in good or excellent condition, and that have high management priority. Exclusion of livestock is but one method that will be examined in the activity plans.

5-3

This plan directs the use of adjacent watershed protection measures (see Appendix A).

5-4

The public lands along the Grande Ronde River are proposed for designation as an Area of Critical Environmental Concern and trails, off-road vehicle use will be limited to designated roads and trails.

Wild and scenic values will be protected until the recommended study is completed and subsequent decisions are made concerning the river's future status.

29

7

R. A. Hunt
MCR 88, Box 100
Baker, Oregon, 97614 - 9501
May 28, 1986

Mr. Jack Albright, Area Manager
Baker Resource Area Office
Bureau of Land Management
United States Dept. of Interior
1550 Dewey Avenue
Baker, Oregon, 97614

Dear Sir:

I have reviewed the rather extensive draft of the Baker Resource Management Plan. Without commenting at this time on the plan in general, I was greatly disturbed by the lack of any program for the control of noxious weeds. The long term goals are for the return to climax vegetation and the plan suggests the ecology for reaching these goals taking into consideration reasonable use factors. However the extreme competitiveness of certain alien plants to move in if uncontrolled can well completely negate all other efforts to achieve the goals. For example, Balm Creek has been declared a riparian zone. But in this Balm Creek Zone white top, Canada Thistle, Yellow Star Thistle, and Scotch Thistle are making inroads. If unchecked within a period of five to ten years these weeds could be expected to represent most of the cover. As well as making these acres virtually worthless, they would serve as a source for continued spread.

When my Great Grandfather John Henry Mc Murren and his family, including my Grandfather William, travelled through "Lone Pine Valley" in a wagon train in the 1850's in his diary he wrote of the pristine beauty of waving grasses and native shrubs and trees. He was so impressed that he returned in the early 1860's from the Willamette Valley to become one of the first farmers in the Pocahontas Area. But in those early days there was no White Top, Canada or Scotch Thistle or Yellow Star to out-compete the native plants and reduce the vegetation to a chaotic near worthlessness. Had there been, Mr. Mc Murren certainly would not have written of the beauty of Lone Pine Valley and most certainly would never have returned.

So what I am saying is that to achieve a goal of climax vegetation certain weeds must be controlled. If they are not, the overall plan becomes meaningless.

Very truly yours,

RECEIVED
MAY 30 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR

1986 25 1986
HOWARD

8



OREGON INTERGOVERNMENTAL PROJECT REVIEW

State Clearinghouse
Intergovernmental Relations Division
155 Cottage Street N. E.
Salem, Oregon 97310
MAY 22 1986

Phone: (503) 378-3732 or Toll Free in Oregon 1-800-422-3600

STATE AGENCY REVIEW

Project Number: OR 86C-15-047-4 Return Date: MAY 23 1986

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the return date.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project has no significant environmental impact.
- () The environmental impact is adequately described.
- (X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.
- () No comment.

Remarks

A much more extensive inventory of mineral resources and geologic information is needed. Map 4 shows the locations of most of the historic gold mining areas that include BLM lands. The map can be improved by adjusting the mineral area boundaries as indicated on DOGAMI GMS-36. The Sparta area should be included. A concise discussion of the geology, mining history and current activity of each area should be added to the text. The probability that other unidentified mineral resources are likely to occur outside these known mineral areas should be acknowledged. The list of references (page 21) lacks many of the classic information sources.

Agency: BLM

By: [Signature]

IPR #5

7-1 BLM's Northwest Area Noxious Weed Control Program FIS analyzes weed control for the northern states, including the Baker Planning Area. Although this RMP does not also analyze weed control, it recognizes infestation of noxious weeds and proposes to implement weed control consistent with the Northwest Weed Control Program FIS.

8-1

Industrial minerals is poorly covered. Limestone is widely exposed in areas 8 and 10 (map 4) and in a belt between these two areas. Much of it is cement grade. Add "Nonmetallic minerals of Eastern Oregon" by Moore to the list of references. There are diatomite and clay occurrences in Baker County that have economic potential. Building stone occurrences in the Pleasant Valley area have been utilized in the past. Planning criteria (page 5) call for identification of areas suitable for mineral material disposal and a review of material site rights-of-way in the Baker Resource area. If these inventories were made they should be part of the RMP or at least referred to as information sources.

8-2

Statements on page 55 and elsewhere indicate that about 25 percent of BLM lands would carry some restrictions in regard to leasing. We found no adequate definition of these restrictions or where to obtain this information.

8-3

The geothermal resources map (map 8) does not show all of the favorable areas indicated on the NOAA map (GMS-11), which is not referenced. The outline of the potential oil and gas resource area (map 8) makes little geologic sense to us.

8-4

Table 20 indicates there were zero jobs in mining in the 5-county area in 1982 while employment numbers are concealed as proprietary information. Ash Grove Cement West Co. employs 105 people, although not all are directly involved in mining. There were many sand, gravel and crushed stone operations and several gold placers; also, much exploration including Nerco at Bald Mtn., Amax at Bourne, Manville at Unity.

Page 33 includes the statement that BLM policy encourages development of public land mineral resources. Elsewhere the emphasis of "Mineral Resource Management" sections is on compliance inspections and the protection of natural and cultural values. This is a necessary part of management. However, we think a more positive attitude toward improving our knowledge of mineral resources of Federal land and the conservative development and use of them is warranted.

8-5

Inventories are planned for cultural and paleontological resources and for threatened and endangered species. We found no mention of plans to inventory minerals except coal.

8-6

The text (page 21) says there are 513,000 acres of split estate lands where the BLM administers the subsurface resources. These lands are not identified on any of the maps.

8-7

The plan contains little information on mined land reclamation procedures and fails to indicate the memorandum of understanding between BLM and DOGAMI in this regard (see page 7). Although Appendix G (page 102) notes that state laws requiring reclamation exist, there is no indication of which statutes are applicable or what is required. The plan should include statements that the BLM administers oil and gas leasing on Forest Service land and that the 1872 mining laws apply.

8-8

Information regarding mineral resources in areas proposed for withdrawal under the Natural Environment Protection and Preferred alternatives is needed. The exact locations of the withdrawals are not given but they will include or adjoin the Flagstaff Mine (Oregon Trail Special Management Area) and the Mother Lode Mine (Keating Riparian Zone) which have a combined historic production in excess of 13,000 oz. Au; 3,000 oz. Ag; and 1,000,000 lbs of copper. Both properties consist of unpatented claims that have been explored by major mining companies in the last several years.

Table 21 shows income from livestock grazing, timber production and recreation; recreation income is shown to exceed that of livestock grazing many-fold. Search of the text shows the livestock figure represents Section 15 lands (50,397 acres) while recreation applies to all BLM lands (29,754 acres) in the resource area.

8-1 A Resource Management Plan/Environmental Impact Statement is designed to propose and analyze land use allocations in response to identified issues and concerns. Management levels and intensity must be determined for allocations proposed by the plan. As an example, active mineral development areas will be managed more intensively than potential mineral resource areas with no present or anticipated development, such as in the Sparta area. Map 4 shows the areas where mineral development is anticipated and where our management priority will be placed. Maps 8, 9 and 10 display management priorities as determined for each alternative (see also Appendix F in the Draft RMP/EIS). Note also, as explained in Appendix F, that Management Priority Areas do not represent exclusive use areas.

Mineral material disposal and mineral site rights-of-way will be allowed on a case-by-case basis when consistent with the protection of other resource values, as described in Chapter 2 of this document.

8-2 Some Federal lands (968 acres) are presently withdrawn from oil and gas leasing. No new leases are being issued in 13,857 acres of Wilderness Study Areas until final action on them is taken by Congress. All other Federal lands are leased or available for leasing for oil and gas with stipulations that restrict or control the way in which leaseable mineral resources are developed. Table 34 of the Draft RMP/EIS (p. 47) and Appendix A of this document briefly describe standard and special stipulations.

The special stipulations mentioned are: (1) seasonal stipulations during the summer, 1 to 3 months; (2) seasonal stipulations during the winter, 3.5 months; and (3) "no surface occupancy". It should be noted that there were no areas with winter seasonal stipulations that overlapped with areas with summer seasonal stipulations.

The purpose of special stipulations is to alert potential lessees that these tracts of land have resource values that may require mitigating measures that can limit development activity and/or increase the cost of development. "No surface occupancy" is of course the most limiting special stipulation. Special seasonal stipulations most often result from crucial wildlife habitat requirements. Definitions of the special stipulations are included in the glossary of the Draft RMP/EIS.

Present restrictions on oil and gas leasing are on file at the Baker Resource Area Headquarters. The crucial wildlife habitat areas that resulted in special seasonal stipulations for the preferred and natural environmental protection alternatives are also on file and are shown on Map 7 of the Draft RMP/EIS.

8-3 The prospectively valuable areas for oil and gas and geothermal resources, as shown on Map 8, are resource classifications that are based on criteria established by the United States Geological Survey. It may indeed be that these classifications need to be updated. However, until these resource classifications are changed they remain the official classifications.

8-4 Table 20 has been revised. See page 26, Chapter 3, Text Revision.

8-5 Ongoing mineral and other resource inventories are required by law. However, they are subject to funding by Congress.

8-6 The split estate lands are not shown on a map largely due to the fact that the 1:100,000 scale base maps that show split estate lands have not been completed by the U.S.G.S. for the entire Baker Resource Area. In addition, several of the recently published 1:100,000 scale maps have numerous errors in land status and need to be revised. The location of the split estate lands can be determined from information on file at the Baker Resource Area Office.

8-7 The text has been revised to include your concern. See Chapter 3, Text Revisions.

8-8 In Table 38 of the Draft RMP/EIS, the proposed withdrawals from mineral entry under the mining laws are identified as all of the Oregon Trail ACRC and Keating Riparian NSA/ACRC. These NSAs are shown on Map 6 of the Draft RMP/EIS.

The legal descriptions of the proposed withdrawals under the preferred alternative are included in Appendix E of this Proposed RMP/Final EIS. Three of the six tracts identified as proposed withdrawals are located within the Balm Creek and Virtue Flat minerals management priority areas and do have high mineral potential. However, the amount of the proposed withdrawal is insignificant in relation to the mineral resource base.

9



DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

State Clearinghouse
Intergovernmental Relations Division
155 Cottage Street N. E.
Salem, Oregon 97310

MAY 01 1986

Phone (503) 378-3732 or Toll Free in Oregon 1-800-422-3600

STATE AGENCY REVIEW

Project Number: OR 860415-047-4 Return Date: MAY 23 1986

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the return date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

- () This project has no significant environmental impact.
(X) The environmental impact is adequately described.
() We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.
() No comment.

Remarks

DCD appreciates the efforts made by BLM to address local comprehensive plans and the statewide planning goals in this EIS.

Agency LCDC
IPR #5

By James B. Knight
578-2973

10

General File #7-2-4-300

Forestry Department

OFFICE OF STATE FORESTER

2600 STATE STREET, SALEM, OREGON 97310. PHONE 378-2560.

May 21, 1986

RECEIVED
Vale, District BLM

MAY 27 1986

Boyle			
ACM			
AGS			
ALA	X		
ALC			
ALD			
ALF			
ALG			
ALH			
ALI			
ALJ			
ALK			
ALL			
ALM			
ALN			
ALO			
ALP			
ALQ			
ALR			
ALS			
ALT			
ALU			
ALV			
ALW			
ALX	X		
ALY			
ALZ			

General File #7-2-4-300

REVIEW OF THE BAKER RESOURCE MANAGEMENT PLAN
DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Baker Resource Management Plan Draft Environmental Impact Statement (DEIS) presents an array of alternatives for managing the resources found in the Baker Resource Area. The Oregon State Forest Department (OSFD) has analyzed these alternatives and can support either the commodity production or the preferred alternative. Both alternatives offer a means of managing natural resources for the benefit of Oregon's citizens in Baker, Malheur, Morrow, Umatilla, Union and Wallowa Counties.

Land Tenure and Reality Program

Appendix I presents information regarding the Baker planning area's program for land disposal for isolated tracts of BLM land. OSFD, continues to support efforts to consolidate ownerships, thereby reducing management costs. The Baker DEIS not only presents a viable program for disposal of these sites, but also initiates a cooperative management agreement strategy with other state and federal agencies for managing these areas.

Interagency Coordination

Coordination with state resource management agencies has been described in the DEIS. We believe that the Baker Resource Area plan reflects a good understanding of statewide resource management goals and policies regarding such resources as air, water, fish, wildlife and forests. OSFD encourages BLM to continue its cooperative effort with state agencies regarding resource management.

Wilderness Study Areas

Even though BLM's Oregon Wilderness DEIS details potential wilderness study areas (WSA), a discussion of the sites that exist in the Baker resource planning unit would be appropriate. Map 1 has identified three WSA areas, however, no discussion of the areas have been included in the plan.

10-1

A portion of McGraw Creek has already been designated as wilderness in 1984. Information regarding this site should also be included in the Baker plan. Map 1 still notes that McGraw Creek is a WSA instead of a designated wilderness.

William C. Calkins
District Manager
Bureau of Land Management
Vale District Office
P.O. Box 700
Vale, Oregon 97918

SUBJECT: BAKER RESOURCE MANAGEMENT PLAN DRAFT ENVIRONMENTAL
IMPACT STATEMENT

Dear Mr. Calkins:

Last year the Oregon State Forestry Department reviewed and submitted comments to BLM on the preliminary issues and proposed land use alternative document for the Baker Resource Management Plan. Areas of concern expressed in our November 18, 1985 letter centered on two issues: land tenure and realty management plus special management area identification.

The March 1988 DECIS for the Baker Resource Management Area identifies four alternatives. The Department of Forestry has reviewed the plan and is supportive of an alternative that maximizes social and economic opportunities and protects environmental quality of all natural resources. We believe that BLM preferred alternative has attempted to recognize the benefits that the natural resources provide to people living in the area and influenced by the Baker Management Area planning decisions.

Attached you will find a summary of the Oregon State Forestry Department's review of the Baker Resource Management Plan DEIS.

If you have any questions regarding the information presented in our review, please feel free to contact Dave Stere (378-5387).

Sincerely,

H. Mike Miller
State Forester

HMM/RB:jp
Attachment

10-2

Homestead Wilderness Study Area contains 330 acres of commercial forest land with 19 percent of the total programmed harvest in the Vale District. This factual data was presented in the BLM Wilderness DEIS and should also be noted in the plan.

Additional Comments

10-3

Annual harvest level projections for the no-action alternative in the Resource Management Plan were higher than those found in the DEIS no-action alternative. Discussions with the Baker Area planning staff provided information that certain commercial forest land had been transferred to the Northern Malheur Show Area. A comparison of maps between the proposed land use alternative, October 1985 document, and the current DEIS show no change. If no alternative transfer has occurred, it should be depicted on the MAP.

Summary

The Baker planning area staff has produced a complete document addressing most of the major issues facing this resource area. With the exception of minor changes, the Department supports the preferred alternative presented in the DEIS.

RGB : 50

10-1 The original McGraw Creek Wilderness Study Area was 1,465 acres. As pointed out in Chapter One of the Draft, a portion (968 acres) was designated as wilderness through passage of the Oregon Wilderness Act of 1984. The remaining 497 acres will be addressed in a supplement to the Draft Oregon Wilderness SIS.

10-2 The majority of commercial timber in the Homestead ACEC area would be excluded from harvest because it is economically non-operable. Refer to Table 29 of the Draft RMP/EIS.

10-3 The commercial timber lands occurring in the Northern Malheur Resource Area were not mapped for the Proposed Land Use Alternatives published in October, 1985 or this Draft RMP/EIS. These lands were not included in the analysis in this RMP/EIS because they are administered by the Northern Malheur Resource Area. Those commercial timber lands were analyzed in the Northern Malheur Resource Area Management Framework Plan completed in 1979. The lands in Malheur County that are shown on the maps are not forested.



IN REPLY REFER TO:

L7619(PNR-RE)
DLS 86/16

JUL 24 1986

United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
81 South King Street, Suite 212
Seattle, Washington 98104

RECEIVED
JUL 28 1986

BUREAU OF LAND MANAGEMENT
DAKER, OR

To: Area Manager, Bureau of Land Management, Baker Resource Area,
1550 Dewey, Baker, Oregon 97814

From: Associate Regional Director, Recreation Resources and
Professional Services, Pacific Northwest Region

Subject: Review of Draft Resource Management Plan/Environmental Impact
Statement (RMP/EIS) for the Baker Resource Area of the Vale District

When the Wallowa-Whitman National Forest Plan was reviewed by the National
Park Service, detailed comments were provided to the Forest Service on the
river study process. Those previous comments establish the framework for our
current comments on the Bureau of Land Management (BLM) RMP/EIS.

The National Park Service is the custodian of the Nationwide Rivers Inventory
(NRI), which was conducted under the authority of the Wild and Scenic Rivers
Act (W&SRA). The following is provided for your consideration in developing a
Resource Management Plan which contains uniform and systematic river study
procedures.

There should be, to the extent practical, comparable study procedures and
management actions between the Forest Service and BLM to bring appropriate
rivers before Congress for their consideration for Wild and Scenic River
status. When a river flows through lands administered by the Forest Service
and the BLM, cooperative river studies should be conducted. For example, the
draft proposed plan of the Wallowa-Whitman National Forest proposes to
recommend to Congress the Grande Ronde River for inclusion in the National
Wild and Scenic River System. However, only the portions of the Grande Ronde
within the National Forest are included in this recommendation. The Baker
Resource Management Plan (BRMP) proposes to designate the Grande Ronde as an
Area of Critical Environmental Concern (ACEC). The cooperative management
proposal in the BLM plan would be greatly enhanced if similar river
designations were in force on Forest Service- and BLM-administered lands.
Therefore, the Forest Service and the BLM should cooperatively conduct
eligibility and suitability studies for Wild and Scenic River status on the
Grande Ronde River. If the studies conclude that the Grande Ronde River
qualifies for wild and scenic status, a joint recommendation for its
designation as a Wild and Scenic River should be made.

11-1

- 11-1 The BLM's recommendation for the Grande Ronde River is in Chapter
2, Recreation. See also discussion in Response 21-1.
- 11-2 Only 200 yards of Pine Creek shoreline are public lands
administered by BLM. We therefore have not made any
recommendations on this stream.

2

Any river worthy of special designation as an ACEC would appear to also be
worthy of consideration for Wild and Scenic River status. This would include
the Powder and Grande Ronde Rivers and Joseph Creek, each of which has
potential as an ACEC or an Outstanding Natural Area (ONA) in your plan.

11-2

In addition, we recommend that you add Pine Creek to this list of streams with
Wild and Scenic River potential. Pine Creek was identified in the Pacific
Northwest Rivers Study as having "substantial" recreation value. Joseph Creek
and the Grande Ronde River were also rated as "outstanding," while Pine Creek
and the Powder River were rated as "substantial." A description of the
Pacific Northwest Rivers Study method and a printout of recreation values
rated by activity are enclosed.

Two additional enclosures are provided which were developed in our review of
the Wallowa-Whitman Forest Plan which address the river planning process.
These two enclosures summarize National Park Service recommendations regarding
river studies. They are applicable to any agency doing river planning. The
river terminology enclosure is one possible set of terms that may be used.
The purpose of the enclosure is to precisely define river study terms.

Thank you for the opportunity to comment upon your plan.

Richard L. Winters
Richard L. Winters

Enclosures 3

1. Pacific Northwest Rivers Study: Description and Printout
2. River terminology
3. River study flow chart

CC:
WASO-762, Environmental Compliance Division

12 ELLINGSON
LUMBER CO.



P. O. BOX 806
BAKER, OREGON 97814
PHONE 523-6604

June 10, 1986

Mr. Jack Albright
Area Manager
Baker Resource Area Office
Bureau of Land Management
1550 Dewey Avenue
Baker, OR 97814

Dear Mr. Albright:

I am writing in response to and to comment on your recently
published Baker Resource Management Plan.

It is my opinion, after reviewing your Plan, that you should
choose the Commodity Production Alternative (CPA). The CPA
will provide the best economic stability for the resource
dependent communities and counties in Northeast Oregon.

12-1

I would prefer to see the timber harvest on BLM lands
increased rather than decrease as would occur in the
Preferred Alternative (PA). Lumber producers in Northeast
Oregon are going to be more dependent on timber sources
outside the National Forests, if the Forest Service is
successful in reducing the allowable cut. The BLM could
provide additional timber with more intensive management
and harvest within areas avoided in the past. I would
like to see you provide a timber sale in the Hunt
Mountain area, for example.

Even though Table 1 shows many negative effects of CPA, I
believe adequate protection of natural resources will be
provided if CPA is adopted. There are many management
laws on the books to see that adequate resource protection
takes place.

Yours Very Truly,

ELLINGSON LUMBER CO.

Gary L. Johnson
Gary L. Johnson
Logging Manager

GLJ/sac

cc: Robert P. Ellingson, III

RECEIVED

JUN 12 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR

12-1 The current timber harvest level is based on a sustained yield, which is a yield that a forest can produce continuously from a given level of management. It is our goal to provide a stable amount of timber to industry.

We are currently developing a forest management plan for the Hunt Mountain area. Among other things, the plan will indicate proposed road and harvest unit locations, harvest sequence, cutting system and required logging method.

13 STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: IRD

DATE: June 9, 1986

FROM: DEQ

SUBJECT: Comments on the Draft Environmental Impact Statement for the Baker Resource Management Plan

The Department has reviewed the draft Environmental Impact Statement (EIS) for the Baker Resource Management Plan and provides the following comments. These comments are related to air quality and water quality impact of the proposed plan. The Department does not recommend a "preferred alternative" at this time. The deficiencies outlined below reflect the lack of background information for each of the alternatives which is necessary for the Department of Environmental Quality to evaluate before selecting an alternative. After this information is included in the EIS, the Department would be more capable of recommending a preferred alternative.

The Department's main air quality concern is prescribed burning.

Regarding water quality, the Department's concerns focus on the surface water and ground water quality impacts of tree cutting practices, road construction, chemical handling and usage, sewage disposal, and other forest land activities.

The EIS does not include adequate technical information to allow water quality impacts to be assessed. Findings need to be made regarding the consistency of the plan with the provisions of the Clean Water Act; the relationship between baseline water quality conditions and the effects of planned forest activities; water quality monitoring plans; and the different water quality impacts of the alternatives.

State of Oregon Department of Environmental Quality Air Quality Division

Air Quality Checklist For Draft Environmental Impact Statements for the Baker Resource Management Plan

I. Air Quality Division Comments

To assist you in responding to our concerns information describing air quality monitoring activities and summarizing air quality conditions across the state may be found in the Air Quality Division's Annual Report. Copies of this report and other information can be obtained by writing to the Division or calling (503) 229-5359. Technical assistance and guidance in the preparation of EIS's is available from the Department on request.

Forest Planning Impact Analysis

In preparing forest plan or timber sale EIS's, the principal issue of concern to the Department is that of air quality impacts related to forest prescribed burning. A basic requirement of all EIS's is presentation of an analysis of planned burning in relation to past burning activities. If it can be shown that projected annual and daily air pollutant emissions do not exceed, or are expected to be less than that which occurred during the 1978 baseline period (using emission estimation methodology for baseline and future years developed by Sandberg, et al, USDA Forest Service), then issues discussed in Sections A and B are satisfied and no additional technical analysis of these issues is required. For the Baker RMP 1978 baseline emissions data may not be available. The EIS author should therefore contact the Department for guidance.

The following discussion summarizes Department of Environmental Quality, Air Quality Division concerns that should be included in the draft Baker Resource Management Plan (RMP) environmental impact statement (EIS).

Our comments are organized into four major sections, each of which should address the adequacy and consistency of the RMP with respect to the following elements:

- Attainment and Maintenance of Air Quality Standards
- Prevention of Significant Deterioration Requirements
- Visibility Protection of Class I areas
- Consistency with Air Quality and Visibility Control Strategies
- Consistency with Federal and State environmental policies

A. Attainment and Maintenance of Air Quality Standards

A basic requirement of an EIS is to evaluate the impact of the proposal with respect to Clean Air Act and Oregon Clean Air Implementation Plan requirements. The first issue that an EIS must address is that of impacts on air quality standard

attainment and maintenance. Specifically, the EIS must show that the proposed action does not cause or significantly contribute to air quality standard violations. In addition, air quality impacts within attainment areas must not exceed Prevention of Significant Deterioration (PSD) increments (Table 2) nor may the impact cause violations of air quality standards (See Annual Report) estimated by summing current air quality conditions and the estimated increment for the appropriate averaging times.

- Part C of the Clean Air Act, requires the Department to insure that pollutant increments in Class I areas (Table 2) do not exceed specific limits adopted by Congress irrespective of the originating source. To assure that these increments are not exceeded due to planned increases in prescribed burning emissions, a technical analysis of the impact of planned burns on nearby Class I areas (see Annual Report) and Class II lands would be required. As noted above, such an analysis would not be required if it can be shown that the proposed burning activity would not exceed that which occurred during the baseline (1978) period within the study area. If the analysis indicates significant impacts, specific quantifiable measures designed to mitigate the impacts must be described in the EIS.

Visibility Protection of Class I Areas

The Oregon Visibility Protection Plan requires the protection of visibility within Class I areas during the period of the July 4th weekend through Labor Day. The EIS should evaluate the impact of proposed prescribed burning activities on the Visibility Protection Plan with respect to protecting visibility within Class I areas from further deterioration. If smoke management techniques will be employed to ensure minimum visibility impacts in nearby Class I areas, the smoke management program objectives and program description should be included in the EIS.

Consistency With Air Quality and Visibility Strategies

Proposed increases in prescribed burning emissions above the 1978 baseline must be evaluated with respect to the Visibility Protection Plan. If increased burning is projected, the EIS must address the issue of how increased burning will impact Class I area visibility. Also see comment B, above.

Consistency With Federal and State Environmental Policies

Department policy (OAR 340-20-001) require that the Highest and Best Practicable Treatment and Control be applied to pollution sources within Oregon. OAR 340-13-005, Environmental Standard for Wilderness Areas, sets forth policies on environmental impacts within wilderness lands. The EIS should include a statement addressing the consistency of the proposed plan with respect to these policies, stating the degree to which alternatives to prescribed fire have been considered.

Table 1
Significant Air Quality
Ambient Air Quality Impacts
For Nonattainment Areas
(micrograms per cubic meter)

Pollutant	Annual	24-Hour	8-Hour	3-Hour	1-Hour
SO ₂	1.0	5.0		25.0	
TSP	0.2	1.0			
NO ₂	1.0				
CO *			0.5		2.0

* Milligrams per cubic meter

Table 2
Maximum Allowable Increases
(PSD) Increments)
Micrograms Per Cubic Meter

Class I Areas					
Pollutant	Annual	24-Hour	8-Hour	3-Hour	
SO ₂	2.0	5.0		25.0	
TSP	5.0	10.0			
Class II Areas					
Pollutant	Annual	24-Hour	8-Hour	3-Hour	
SO ₂	20.0	91.0		512.0	
TSP	19.0	37.0			
Class III Areas					
Pollutant	Annual	24-Hour	8-Hour	3-Hour	
SO ₂	40.0	182.0		700.0	
TSP	37.0	75.0			

FY2794.A (6/9/86)

-3

13-4

- b) Statements are made regarding agricultural impacts on water quality. However, there is no discussion as to any existing problems that may be attributed to current forestry activities. The plan will need to provide more detailed information of the impacts on water quality from agricultural and forestry activities, including any mitigating measures.

13-5

B. Review of Water Quality Monitoring Plans

The plan does not include a commitment to monitor management activities for impact on water quality. To insure that proposed activities do not adversely impact water quality, a monitoring program must be instituted. If the predicted changes in water quality occur, as discussed on page 62, the need for a monitoring program becomes even greater. The reason being that adjustments can then be made in the monitoring program to prevent serious degradation in water quality.

C. Management Alternatives

The DEQ made no attempt to determine a preferred alternative for water quality. No detailed water quality information was provided to establish baseline conditions in streams of the resource area. The DEIS does make an attempt to predict water quality changes in Table 35. However, without displaying the existing water quality, acceptance of "no change" under the preferred alternative may not be acceptable on an already degraded stream. In this example we would want to see management techniques applied that would improve stream conditions.

13-6

D. Ground Water Quality Protection

The DEIS was reviewed for its adequacy to protect ground water quality. The DEIS virtually ignores the groundwater component of the hydrologic cycle. Although ground water probably will be minimally affected by management activities, the DEIS should recognize the importance of groundwater quality protection and factually support the statement of impact.

For further information regarding water quality, contact John Jackson (229-6035).

FY2794.A (6/9/86)

-5-

II. Water Quality Division Comments

The following are the Department of Environmental Quality (DEQ), Water Quality Division comments on the Draft Baker Resource Management Plan Environmental Impact Statement. The document was reviewed within the concept that land management activities have the potential to beneficially or adversely impact the quality of the waters in the forestland downstream of the forest. The management plan has the opportunity to improve existing degraded resources and to maintain or protect existing desired resource conditions. The level of emphasis placed on water quality conditions and the processes used to protect that quality play an important role in providing guidance to the managers in the future on a project-by-project basis.

We reviewed the plan with respect to the following elements:

- Consistency with Provisions of the Clean Water Act
- Proposed Water Quality Monitoring Plans
- Management Alternatives
- Ground Water Quality Protection

13-2

Consistency with Provisions of the Clean Water Act

The plan identifies the need to comply with Federal and State water quality standards in Appendix G of the Plan. However, the introductory paragraph of the appendix suggests that these requirements, "could be applied as stipulations or requirements on proposed projects at the discretion of the authorized offices."

This statement, as it pertains to water quality standards, is totally unacceptable. If this discretion is exercised, the person and the BLM would be in violation of the Clean Water Act and the Oregon Forest Practices Act.

The means to assess the plan's ongoing effectiveness during the life of the plan are seriously lacking for the following reasons:

13-3

- Discussion of existing water quality and current trends is inadequate considering the public value placed on the lands for visual quality, recreation and water quality. We suggest the plan and EIS emphasize the existing water quality and trends displaying the information in a section in the appendices to the EIS. With the magnitude of the potential impacts that this plan can have on water quality, it is vitally important to display the baseline water quality conditions in some detail prior to implementation of the plan.

FY2794.A (6/9/86)

-4

- During 1978, 5,847 tons of fuel were burned in slashburning and prescribed burning for wildlife habitat improvement (see revised Table 36 in Appendix D of this document). Since then, improved burning techniques and fuel load reductions allow fires to emit less smoke per unit of area burned. Under all alternatives considered in the RMP/EIS the amount of fuel proposed for consumption falls below the 1978 baseline by at least 1,300 tons, which should contribute to an overall improvement in air quality.

Each slash burn or prescribed burn will be preceded by a prescribed fire plan and an environmental analysis that will address and mitigate impacts including those to wilderness values. Reasonable alternatives to prescribed fire will also be considered. All prescribed fires on BLM lands will employ the best available control technology to minimize smoke emissions. Considerations will include spring-condition fires with high fuel moisture content in large fuels, rapid ignition, and rapid mop-up.

See also Text Revisions for pages 61-62.

- The alternatives presented in the Draft EIS, along with incorporation of standard design features, will meet provisions of the clean water act, specifically Sections 208 and 313 and the Memorandum of understanding (MOU) with the Oregon Department of Environmental Quality as amended to include livestock grazing. See Chapter 3, Text Revisions and Appendix A.

- Existing water quality data have been incorporated into this proposed plan. See Appendix B.

- Standard design criteria in Appendix A of this Proposed RMP/Final EIS include mitigation practices for disturbing activities.

- A section on monitoring has been added to Chapter 2. Water quality monitoring will be conducted in accordance with the above MOU and in accordance with Executive Order 11514, as amended (EO 11591).

- The BLM recognizes the importance of groundwater and problems associated with these resources in Oregon.

14



OREGON INTERGOVERNMENTAL PROJECT REVIEW

State Clearinghouse
Intergovernmental Relations Division
155 Cottage Street N. E.
Salem, Oregon 97310

U.S.D.
MAY 30 1986

Baker Resource Management Plan, Draft Environmental Impact Statement
Phone (503) 378-3732 or Toll Free in Oregon 1-800-422-3600

STATE AGENCY REVIEW

Project Number: OR 960411-047-4 Return Date: MAY 23 1986

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the return date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

- () This project has no significant environmental impact. _____
- () The environmental impact is adequately described. _____
- () We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement. _____
- () No comment. _____

Remarks

Comment from Morrow SWCD, PO Box 127, Heppner 97836 - ph676-5452: Effects, although measurable, would be acceptable; please coordinate the implementation of the proposal with us; we recommend the preferred alternative.

Comment from Eagle Valley SWCD, PO Box 206, Richland 97870; ph: 893-3753: the statement will produce adverse effects (none listed).

Agency Agri
IPR 85

By George Stubbert



United States
Department of
Agriculture

16

Soil
Conservation
Service

June 16, 1986

Jack Alwright-Area Manager
Bureau of Land Management
P. O. Box 907
1550 Dewey Ave.
Baker, Oregon 97814

Re: Comments on the March 1986 Draft of the Baker Resource Management Plan EIS.

As our Baker County Soil Survey mapping is nearing completion, our field and area office staffs are locating relic areas throughout Baker County. These areas represent range sites in a climax-excellent condition for all range soils mapped.

16-1 We would like to request your cooperation in preserving these areas for us. This may require fencing out these areas so there will be no grazing or grazing for a limited time during the fall months.

Enclosed is a map showing location of our designated relic areas. We would like to visit these sites for field review with you and our Area Range Conservationist, Alan Bahr. Please contact us when it will be convenient for you.

We will assist you in any way we can to preserve these areas.

Thank-you for your cooperation.

Sincerely,

Rhoda Portis

Rhoda Portis, District Conservationist
Soil Conservation Service
3990 Midway Drive
Baker, Oregon

cc: Gary Yeomans-Area Conservationist
Alan Bahr-Area Range Conservationist
William E. Laird-Soil Survey Party Leader
enclosures

Soil	Act	Int	Int
Area 1			
Area 2			
Area 3			
Area 4			
Area 5			
Area 6			
Area 7			
Area 8			
Area 9			
Area 10			
Area 11			
Area 12			
Area 13			
Area 14			
Area 15			
Area 16			
Area 17			
Area 18			
Area 19			
Area 20			



The Soil Conservation Service
is an agency of the
Department of Agriculture



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
FACILITY MANAGEMENT & TECHNICAL SERVICES DIVISION
P.O. Box 1000, Building 200
Washington, D.C. 20540

June 18, 1986

F/NWRS:222

15

Mr. Jack Albright
Area Manager
U.S. Bureau of Land Management
Baker Resource Area Office
1550 Dewey
Baker, Oregon 97814

Re: Baker Resource Management Plan, Draft Environmental Impact Statement (DEIS)

Dear Mr. Albright:

National Marine Fisheries Service (NMFS) has reviewed the subject DEIS and recommends that the Preferred Alternative identified in the document be selected for management of the Baker Resource Area. It provides a satisfactory balance of protection, improvement and utilization of Federal resources. We are forwarding these comments to you in parallel with their transmittal to our Washington, D.C. office. Final National Oceanic and Atmospheric Administration comments may follow at a later date.

Sincerely,

Dale R. Evans
Division Chief

cc: BLM - Art Oakley
ODFW - Carlson
FWS - Craig

RECEIVED

JUN 19 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR



OREGON/Baker Co

RR 6/86

RELIC SITE LOCATIONS

SOIL/RANGE SITE CORRELATION - MAJOR LAND
RESOURCE AREAS BLM, BND

LOCATION/OWNER/USE	VEGETATION	SOIL
#1 - NW 1/4 SE 1/4 T9S R4E - BLM	ITN LOW 9-12 FE - RICH/FIELD/BLM	- VIKTOR SILT LOAM 3'2
#2 - SW 1/4 SE 1/4 T9S R4E - L. BRIKE	MTN CLAY 9-12 FE - RICH/FIELD	- EMERALD STONY SILT LOAM 3'2 (over silty)
#3 - NW 1/4 NW 1/4 T9S R4E - BLM	MTN CLAY 9-12 FE - RICH/FIELD	- RICH STONY SILT LOAM 4'2 (over silty)
#4 - NW 1/4 NW 1/4 T9S R4E - BLM	ITN SHALLOW 9-12 FE RICH/FIELD/POD	- RICH STONY SILT LOAM 3'2 (over silty)
#5 - NW 1/4 SW 1/4 T9S R4E - BLM	MTN NORTH 9-12 FE - RICH/FIELD	- DURVE LINE GRAVELLY SILT LOAM 30'2N
#6 - NE 1/4 NE 1/4 T9S R4E - BLM	SOFT SILT - GRN/FIELD	- DARK CANYON EXTREMELY GRAVELLY LOAM 20'2E
#7 - SW 1/4 SW 1/4 T9S R4E - G. HANSEN	STEEP SOUTH 9-12 FE - RICH/FIELD	- RICH STONY SILT LOAM 3'2
#8 - SE 1/4 SW 1/4 T9S R4E - BLM	SHALLOW STEEP SOUTH 9-12 FE - RICH/FIELD	- RICH STONY SILT LOAM 3'2
#9 - NW 1/4 SW 1/4 T9S R4E - F.S.	SOUTH 14'2 FE - RICH/FIELD/BLM	- IMAG VERY COBBLY SILT LOAM 20'2 SW
#10 - NW 1/4 SW 1/4 T9S R4E - D. WILLIAMS	MTN SHALLOW 12-16 - RICH/FIELD	- RICH STONY SILT LOAM 3'2
#11 - NW 1/4 SE 1/4 T9S R4E - LORNE POWER	LOW ELEV NORTH 14'2 - RICH/FIELD	- CORNERFIELD VERY COBBLY SILT LOAM 75'2 NW
#12 - NE 1/4 NW 1/4 T9S R4E - BLM	NORTH 14'2 FE - RICH/FIELD/BLM	- RICH STONY SILT LOAM 30'2 N
#13 - SW 1/4 SE 1/4 T9S R4E - F. HANSEN	MTN CLAY 9-12 FE - RICH/FIELD/BLM	- MARSH GRASSY SILT CLAY LOAM 4'2 N
#14 - NE 1/4 SE 1/4 T9S R4E - T. ROUSE	MTN CLAY 12-16 FE - RICH/FIELD	- RICH GRASSY LOAM 12'2 E

16-1 We have included a recommendation for relic areas in this Proposed RMP/Final EIS. See Chapter 3, Text Revisions.

17



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
3300 KENNEDY AVENUE
SEATTLE, WASHINGTON 98148

15A

M/S 443

Jack Albright, Area Manager
Baker Resource Area Office
Bureau of Land Management
1550 Dewey
Baker, Oregon 97814

RECEIVED

JUN 30 1986

BUREAU OF LAND MANAGEMENT
LAMES, OR

Dear Mr. Albright:

The Environmental Protection Agency (EPA) has reviewed the draft Baker Resource Management Plan Environmental Impact Statement (RMP/EIS) prepared by your office. The draft RMP/EIS analyzes four alternatives for overall management of about 430,000 acres of public land administered by the Bureau of Land Management (BLM) in northeastern Oregon. Our review was conducted in accordance with the National Environmental Policy Act, and our authority under Section 309 of the Clean Air Act to determine whether the impacts of proposed federal actions are acceptable in terms of environmental quality, public health, and welfare. Our detailed review report is enclosed.

The draft RMP/EIS was generally well written and understandable. However the analyses presented, together with the highly "qualified" nature of some of the Standard Design Features, do not adequately support that "unnecessary and undue degradation" would not occur with implementation of the BLM Preferred Alternative. Our major concerns regard the potential for adverse water quality impacts to occur under the BLM Preferred Alternative (and indeed under any of the alternatives presented if adequate design features and reasonable monitoring are not always applied). In particular, nonpoint degradation of water quality and impacts to designated beneficial uses can result from grazing, mining, timber harvest, and road construction activities managed by BLM. Managing and monitoring for the cumulative effects of such planned activities in the Baker Resource Area deserves more specific attention in the final RMP/EIS, as later project-specific evaluations are not expected to be able to deal with this aspect of land management effectively.

After careful consideration, we support redesignation of the "Natural Environment Protection Alternative" as preferred. This alternative best protects environmental quality while still providing high levels of commodity outputs; in short, of the alternatives analyzed it best reflects the concept of multiple use. We have rated the draft RMP/EIS as ED-2 (Environmental Objections - Insufficient Information). A summary of the EPA rating system for draft EIS's is enclosed for your reference. After you have had an opportunity to consider our comments, we will contact you to offer our assistance during revision and finalization of the RMP/EIS.

BAKER RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
Review Report of the
U.S. Environmental Protection Agency

Water Quality

The draft RMP/EIS does a good job of describing the various types of activities that have potential to adversely affect water quality including forestry management, mining, grazing and road construction. Little discussion is provided about the location and extent of existing or potential problems, however.

It is noted that sediment and agricultural chemicals account for most of the water pollutants in the area. It is further noted that trout and anadromous fish habitat is in poor condition. The relationships between water quality and fish habitat should be described and general locations of existing problems should be noted. A useful aid to this discussion could be to highlight on a map the important fish habitats and areas of existing water quality problems in the Baker Resource Area. Areas of overlap are obvious focuses for special management attention (i.e., special consideration while determining the appropriate types of activities to permit in and around these locations). This presentation would also help the final RMP/EIS to disclose where future land disturbing activities may affect water quality and beneficial uses. For example, a quick glance at Map 2 shows that high to severe erosion potential land often corresponds with commercial forest lands. The final RMP/EIS should discuss obvious circumstances of potential resource conflicts such as this in some detail. This discussion should include consideration of whether Standard Design Features (Appendix G) are likely to be sufficient in such areas. (It would also be useful if the locations of significant irrigation diversions and hydroelectric impoundments were identified on the area maps.)

Without such information, it is not possible for us to determine whether any alternative is adequately protective of water quality and designated beneficial uses. Given the information presented (both that water quality impacts have occurred and that poor habitat conditions exist for fish as a beneficial use), a high degree of monitoring would be required to support the levels of activities proposed (see Monitoring comments, below).

We have several other specific comments regarding water quality, as follows.

We disagree with the statement on page 60 that road construction and tractor logging impacts would be unavoidable under all alternatives; these activities are permitted by BLM, and are thus avoidable. If adverse impacts are occurring, more restrictive management practices can be applied. If more restrictive practices would not adequately reduce impacts, the activity may be inappropriate in the proposed location. The discussions in the final RMP/EIS should emphasize the development of a framework for determining where and how specific activities may occur. Part of this planning guidance should be that where impacts cannot be satisfactorily reduced, they should be avoided by not permitting the activity.

-2-

Thank you for the opportunity to provide these comments, which are intended to be constructive to BLM's effort toward producing and implementing an appropriate Resource Management Plan. If you have any questions, please contact Mr. Brian Ross of our EIS and Energy Review Section at (206) 442-8516 or FTS 399-8516.

Sincerely,

Robert S. Burd
Robert S. Burd
Director, Water Division

Enclosures

cc: BLM (State Director) USFS (R-6)
USFS (W-WNF) USFS
NMFS ODEQ
ODFW CRITFC
TWS SC

17-1

17-2

Air Quality

17-3 The introduction to the Environmental Consequences chapter states, "Analysis indicated that there would be no significant impacts upon . . . municipal watershed(s), groundwater, (or) floodplains," and that these subjects would not be analyzed further. The text in chapter 2 (p. 12) briefly mentioned groundwater, but municipal water supplies and floodplains are not discussed. The analysis leading to the conclusions that no impacts to these resources is possible should be summarized in the final RMP/EIS; in particular for domestic water supplies.

Without benefit of seeing this analysis, the assertion that no activities on BLM lands have the potential to affect any domestic water supply is somewhat surprising and difficult to accept. Are there no domestic supplies in watersheds which include BLM land? Domestic supplies, for the purposes of applicability of the Interim Primary Drinking Water Standards, are generally defined as serving 25 or more persons for 60 or more days per year. The lack of Congressionally designated municipal watersheds in the area does not reduce the need to address other domestic supplies.

17-4 The Soil and Watershed Management discussion for the No Action Alternative (Chapter 3, p. 39), mentions management stipulations that are currently applied to activities to minimize erosion and water quality impacts. The Natural Environment Protection Alternative would apply more stringent stipulations, while the Commodity Production and BLM Preferred Alternatives do not specifically mention management stipulations. What, specifically, are the soil and watershed management stipulations that have been applied for different activities, to date and how would they differ in each alternative? More importantly, the final RMP/EIS should address the sufficiency of these measures as they have been applied in the past, in order to help frame the reasonability of the proposed practices. Sufficiency would be defined in terms of protection of beneficial uses (i.e., did the practices work, vs. simply, were they applied).

17-5 The same section mentions the Morgan Creek Watershed Plan. This plan should be described more fully. In particular, the problems leading to the need for the plan and the causes of these problems should be described. This is important in order to determine whether the proposed management alternatives for the Baker Resource Area can avoid the occurrence of similar problems in other watersheds. Addressing already existing problems in other watersheds through similar plans is a related but separate issue.

17-6 Existing sanitary problems are mentioned at several points in the Draft. The significance and potential impacts of these problems should be described.

17-7 The Impacts to Water section of chapter 4 (page 62-3) should be expanded in consideration of the above comments. In particular, it should emphasize the beneficial uses of water, such as growth and propagation of fish. Along these lines, one type of impact that is of concern but was not extensively discussed in this section is the sedimentation of spawning and overwintering areas for fish. The draft RMP/EIS does state on page 65 that stream siltation could increase resulting in "extremely small effects" on fish habitat, but no support is provided for this conclusion. There is a growing body of data indicating that when in-gravel fines exceed about 20 percent, survival of salmonids to emergence declines rapidly and significantly. The potential for activities on BLM lands to affect the in-gravel sedimentation of fish streams should be discussed in more detail in the final RMP/EIS.

17-8

The draft RMP/EIS notes that air quality standards are occasionally exceeded in the Area. It further notes that although BLM presently has no smoke management regulations for the Area, smoke management is considered during planning for all prescribed burns. The final RMP/EIS should describe how smoke management is taken into account. For example, page 62 states that with "appropriate mitigation measures" differences in air quality among the alternatives would not be noticeable. The final RMP/EIS should describe what these mitigation measures would entail; i.e., it should provide the guidance for planning later specific burns so that adverse air quality impacts do not occur. Guidance to avoid degradation of the two Class I airsheds in the Area should be specifically discussed. It should also be noted that the RMP/EIS analysis is not adequate for specific air quality assessments, so that site specific data would be necessary for such assessments.

17-9

The draft RMP/EIS notes that wood smoke contributes to air quality standards being occasionally exceeded in northeast Oregon towns. What percentage of local fuelwood is gathered from the Baker Resource Area (as opposed to the Hallowa-Whitman National Forest, for example)?

Managers of public forest lands have a unique opportunity to help educate the public about the relationships between fuelwood use, air pollution, and health impacts. This is because unique access to the woodburning public is provided through the permit process. If you are not already doing so, you may wish to consider distributing informational pamphlets with each wood cutting permit issued. If appropriate literature is not readily available, we would be happy to provide examples that are being used elsewhere.

MONITORING

17-10

The final RMP/EIS should address monitoring in a more comprehensive manner, perhaps by including a summary outline. We recognize that future specific activities will require monitoring in specific ways, and that these cannot always be predicted precisely at the RMP stage. At the same time, project-specific monitoring does little to determine whether the overall impacts of management (especially cumulative effects) are as predicted. The final RMP/EIS should therefore discuss the monitoring that would be done to address overall Area impacts during the life of the RMP, and how the information gathered may be used to modify management practices if necessary. The role of project-specific monitoring should be described as well (although this aspect would of necessity be more generic).

17-11

In several places, the draft RMP/EIS implies that specific types of impacts would be reduced due to increased monitoring under the BLM Preferred and Natural Environment Protection alternatives (e.g., pages 63 and 65). The same is implied regarding increased compliance inspections of mining operations under these alternatives. In both circumstances, however, the monitoring would only occur contingent on funding. This is of significant concern to us. We recognize that monitoring can be very expensive. However, the need for monitoring is commensurate with the degree of risk associated with any alternative; higher levels of outputs likely require more intensive monitoring. We consider that monitoring needs are not separable from the overall alternative. The final RMP/EIS must commit to funding the monitoring needed for each alternative.

Environmentally Preferred Alternative

After careful consideration, we support redesignation of the Natural Environment Protection alternative as the preferred alternative for implementation in the Baker Resource Area. This alternative is the only one analyzed that includes what we consider to be appropriate language for management of the various natural resources of the Area. It is the alternative least likely to result in significant adverse impacts overall, for the following reasons:

- * It is the only alternative which would explicitly require successful mitigation of impacts to riparian resources and values, and development of management programs for all riparian areas not in good condition.
- * It would exclude livestock from six miles of streams (reducing grazing impacts to the greatest extent), while reducing overall livestock use by only 30 AUM.
- * It would increase compliance monitoring of mining operations, while still opening 73 percent of the mineral estate to leasing and development (vs. 75 percent in the BLM Preferred Alternative).
- * It would be most protective of soil and watershed values.
- * It would have a lower intensity of timber harvesting by removing less timber from more acres than the BLM Preferred Alternative (while still maintaining 85 percent of the timber output).
- * It would designate more Special Management Areas (though apparently setting aside for them only 20 more acres overall than the BLM Preferred Alternative would), while still providing significant levels of all other outputs.
- * It would provide the most appropriate emphasis of any of the alternatives on management and monitoring to ensure protection of fish and wildlife, including Threatened and Endangered species.

Overall, the Natural Environment Protection Alternative appears to be a good example of true multiple use management. It is encouraging to see that such management can in fact allow for the production of significant levels of commodity outputs, while providing reasonable protection for other resources. In fact, as the bulleted items above point out, only relatively minor reductions in outputs were necessary to afford a reasonable degree of environmental protection. (Of course, monitoring is still necessary to ensure that significant impacts do not occur.) We believe, however, that the other alternatives generally overemphasize commodity outputs without appropriate emphasis on protecting other resources, and could result in unnecessary and undue environmental degradation.

17-12

The introduction states that the project design features, reclamation measures, and procedures described in the appendix "could be applied as stipulations or requirements on proposed projects at the discretion of the authorized officer" (emphasis added). While this may be appropriate for certain measures, it is not so for all of them. For example, compliance with water quality standards is not discretionary. The introductory phrase quoted above effectively negates some of the specific (and appropriate) language in following sections (particularly the Minerals section).

17-13

The final RMP/EIS should identify the specific standards or design measures whose application would not be a minimum requirement. The introduction should also state that the adequacy of mitigation measures for all types of activities will be determined (by an Environmental Assessment or other appropriate means) prior to implementation of specific projects. The role of monitoring in determining the success of mitigation should also be briefly described or referenced.

17-14

Minerals: This is an excellent section. We are particularly pleased with the emphasis on the objective - prevention of unnecessary or undue degradation - and with the specific measures being clearly aimed at achieving it. We are also pleased with the lack of qualifying terms (i.e., "where practical"). The stipulations in this section are appropriate minimum requirements and should be applied to all operations. This would clearly be the case if the introductory phrase discussed above was not in place. If that phrase is not modified, this section provides no predictability or accountability; these must not be "qualified away" in the RMP.

We have two specific comments on this section. First, paragraph 1 (General) states "Failure to initiate and complete reasonable mitigation measures . . . may constitute unnecessary or undue degradation" (emphasis added). This statement includes the only qualifying term in the section. We believe failure to apply "reasonable" mitigation would by definition result in unnecessary degradation. It is therefore important that "may" be changed to "will." Of course, we are primarily interested that mitigation measures be successful. "Complete" may have been intended to include this concept. Monitoring is the tool by which success of applied mitigation is measured. We suggest rewording along the following lines: "Failure to successfully apply reasonable mitigation measures will constitute unnecessary or undue degradation. Standards defining success, and plans for monitoring these standards, will be determined on a project-specific basis."

Standard Design Features-Appendix G

We consider the standard design measures described in this section to be a key aspect of the RMP. They provide the basic guidelines for project-specific planning that may occur in the future.

17-15 Next, the section dealing with fisheries, wildlife, and plant habitat [paragraph II (A)(2)(d)] only discusses threatened or endangered species. Habitat for non-threatened species may be significant enough that special care is required to minimize disturbance: for example, anadromous fish spawning and rearing areas, or critical wildlife overwintering grounds might require such care. At a minimum, this section should reference that measures to minimize impacts to other species will be required and specified on a project-specific basis.

Timber Harvest In contrast to the Minerals section, this section has numerous qualifying terms. The discussion does not allow us to determine the extent of environmental degradation that may actually occur. We recognize the necessity of allowing authorized officials the flexibility to make project-specific decisions on the ground. However, this section should provide the officials (and the public) with the specific bounds within which the decisionmaking must occur. We have several questions and suggestions, as follows.

17-16 Under Silvicultural Practices (p.104) clearcutting would not be practiced where soils/slope or other watershed conditions are subject to unacceptable damage. Please define "unacceptable damage." What specific features could trigger a decision not to allow clearcutting (i.e., what specific slope/soil type combinations or "other watershed conditions")? It is important that these triggers be exposed to public review and comment at the RMP stage, since future actions will tie back to it. Also, why is 15 years the target for restocking, versus the 5 years generally required of the Forest Service?

17-17 The Roads section in particular needs to be strengthened by removing qualifiers. It should also be expanded somewhat. For example, number 5 under Location of Logging Roads states "areas of vegetation would be left or established between roads and streams." What will be adequate widths for these areas, and what types of vegetation would be left?

17-18 The Soil Protection measures include the requirement that not more than 12 percent of any area become compacted. We are pleased that there is a specific standard. What is the basis for the figure of 12 percent? Is it at or below a threshold of some sort? Also, how will the standard be monitored, and what management actions would occur if it is exceeded?

17-19 We have several comments regarding subsection 7, Protection of Streams, Wetlands-Riparian Areas, and Other Waters. The final RMP/EIS should state whether guidelines given in project planning documents for marking buffer strips can be less stringent than those listed in the RMP. If they can be, it should specify the conditions under which such would be allowed, and discuss why this is reasonable.

17-21 We agree that buffer strip widths cannot be arbitrarily established and guaranteed to be optimum for all situations. However, the functions and values of riparian areas for fish and wildlife habitat and water quality are disproportionate to the area they occupy. This places the burden on multiple use managers to justify when it is reasonable to permit activities in these areas. Therefore, the final RMP/EIS should propose standards (or at least a process for setting them) that more specifically govern activities in riparian areas, emphasizing protection of all their functions and values. For example, paragraph 7(c) on page 106 should be rewritten. The width of a buffer strip should not be determined by "the amount of timber that is to be removed," but rather the other way around.

17-26 Table 29 (page 40). The format of this table makes it confusing. We would suggest breaking it into two tables: one for forest lands and one for woodlands. Also, regarding footnote #7, why are Special Management Areas set aside as a percentage of other managed lands? We would expect the area of each proposed SMA to be determined by the distribution of the values it contains, with EIS alternatives differing in the SMAs chosen but not in the acreage within an individual SMA.

17-27 Off Road Vehicle Use (page 44). What is the method for and efficiency of enforcement of ORV use restrictions in "limited" areas?

17-28 General Methodology and Assumptions for Analysis (pages 59-60). These were useful sections. They should help the public understand how potential impacts were analyzed. We are particularly pleased with assumption 4, which describes the role of monitoring as validating the EIS analyses (predictions of impacts). We suggest your definition of "short-term" note that, for some fish and wildlife species, 10 years can equate to several generations and would thus be "long-term" for them (i.e., emphasize that this is a semantic planning definition only).

17-29 Also, we are confused by the last statement under Assumptions: "BLM capability to fully mitigate impacts is limited under the 43 CFR 3809 regulations." BLM can require reclamation bonding (to be posted with the state, for example), so that appropriate reclamation is assured. Similarly, BLM can issue Notices of Noncompliance for any conditions it observes which are clearly outside of those allowed under an approved Plan of Operations. Of course, other enforcement for violations of water quality standards or NPDES permit conditions would be the responsibility of EPA and the Oregon Department of Environmental Quality. Please expand this discussion in the final RMP/EIS.

17-30 Impacts to Economic Conditions (page 69). Economic impacts have been expressed as local personal income and employment changes. This part of the analysis was presented well. The discussion should be expanded somewhat to acknowledge the regional economic importance of the Area's resources (in particular, salmon).

17-31 Federal Agencies (page 71). As you are aware, EPA was formed by Executive Order in 1970, and does not report to the Secretary of the Interior.

17-32 Wildlife Considerations (p. 104). Regarding snag management, please define "an adequate number of green trees or culls per acre." How will this be determined?

Maps. Mapping can often convey more information more quickly and understandably than many pages of text. The maps distributed with the draft RMP/EIS were useful and of high quality. In particular, the attempt made to overlap key uses with soil erosion hazard areas is commendable. If anything, too much has been attempted to be shown in some cases for a black and white format. We have suggested that some additional information be mapped. Given the expense of multi-color printing, an extra black-and-white map may be the most cost-effective means of providing the requested information.

Similarly, Paragraph 7(d) implies that the goal in determining buffer strip widths is the protection of the other resources (such as water quality). It provides no guidance on how to determine what is required to meet this need, however. Also, while stumps may provide some streambank protection (paragraph 7(e)), they are not a good source of future woody debris or significant shading.

17-22 Paragraph 7(f) is of concern. We believe that where it is "difficult to leave an adequate buffer of timber to shade and protect the stream," the riparian area (and upslope as far as necessary) should not be disturbed. The planning for individual sales must define where and how harvest can occur such that adequate protection of other resources results. Similarly, one way to reduce the likelihood that "excessive windthrow" will be a significant problem (i.e., cause fish migration blockages) is to establish larger buffer strips, not eliminate them.

We are pleased that 75 percent of natural stream shading would be maintained. However, when this shading is achievable with only small hardwood species, other long-term components of the riparian system could be seriously affected. For example, streambank stability and a sufficient source for sustained recruitment of large woody debris would not be guaranteed. Estimates can be made of the amount and type of larger trees that would be necessary to provide these values (using estimates of natural mortality and in-stream decay rates for different tree species). Such estimates allow back-calculation to the amount and type of trees that can be removed from a riparian zone while maintaining its functions and values over the long term. The final RMP/EIS should include such analyses on a general level, so that riparian area guidance for future specific activities can be adequate.

17-23 We are pleased that cumulative effects of roads would be considered relative to key wildlife habitat (p. 107). This consideration should be expanded to other resources (water quality and fish habitat, for example) and not be limited to the effects of roads.

Other Specific Comments

The Planning Area (page 13). A small map differentiating between Section 3 and Section 15 grazing lands would be most helpful.

17-24 Relationship to Tribal Treaties (page 10). We are pleased that this section was included. It should be expanded somewhat to discuss how BLM will interact with the tribes in future project-specific planning.

17-25 Soils (page 12). The text states there are 158,000 acres of fragile soils in the planning area, while Table 7 totals 163,000.

17-26 Table 22 (page 27). We are pleased that this table (Lessee Dependence on BLM Forage) was included. It helps to put the RMP decisions into perspective.

17-1 A Resource Management Plan/Environmental Impact Statement is designed to propose land use allocations in response to issues and concerns of the public, and to identify the impacts of those management actions. Relationships of the various resources, including conflicts, are presented in general terms emphasizing areas for priority management. Resource Management Plans are implemented through site-specific plans or activity plans. These plans identify resource relationships on a site-specific basis. At this level the standard design features are applied in resolving conflicts and mitigating impacts. Activity plans are also in conformance with the National Environmental Policy Act.

17-2 Road construction and tractor logging has the potential to impact soil regardless of the stipulations applied. Short-term impacts will be mitigated using the standard design features in Appendix A. Mitigation is applied on a site-specific basis. All impacts that cannot be mitigated to an acceptable level will result in a no action decision on the particular site. We estimated that in the Baker Planning Area there are approximately 9,300 acres of commercial timber lands where the impacts cannot be mitigated and therefore this acreage will be removed from the sustained timber management base (see Table 29 of the Draft RMP/EIS). This acreage figure is estimated from a sample of the timber lands in the planning area.

17-3 There are no domestic water supplies, as defined by the Interim Primary Drinking Water Standards, on BLM administered lands in the Baker RMP area.

17-4 The Standard Design Features related to land disturbing activities would be the same regardless of the land use alternative selected; only the acres of public lands available for these activities differ by alternative. Each alternative prioritizes resources differently, as in the case with fragile soils. This accounts for different stipulations for alternatives. The standard design features in Appendix A are the result of years of on-the-ground mitigation and monitoring. Considerable public involvement by BLM and the Forest Service, as well as in development of the Oregon Practices Act, has gone into the design of these practices.

17-5 A watershed plan for Morgan Creek is currently being developed to describe measures to correct severe stream bank erosion caused by past livestock management practices and flood events. Other watershed problem areas and proposed corrective measures are included in the Burnt River Habitat Management Plan and the Oregon/Washington Five Year Riparian Management Plan, both scheduled for completion in 1986. See also Response 17-1.

17-6 There are two streams (Grande Ronde and Burnt Rivers) and the impoundment of the Snake River in the Baker RMP area that are of concern because of sanitation problems. These areas are heavily used by river rafters and campers each year and sanitation facilities are very limited. BLM and USFS are currently in the preliminary stages of developing a river management plan that would address sanitation problems on the Grande Ronde River.

17-7 We recognize the potential for land disturbing activities to impact anadromous fisheries streams such as the Grande Ronde River, Wildcat and Cable Creeks. Special emphasis will be placed on fisheries values in site-specific environmental analysis in these areas and on monitoring land disturbing activities to assure compliance with design features and stipulations.

17-8 These concerns are addressed in the response to comment 13-1 and pages 61-62 in Chapter 3, Text Revisions.

17-9 BLM does distribute pamphlets to woodcutters on wood burning. The control of air quality as it relates to wood burning stoves is best handled through the State of Oregon with such efforts as requiring more efficient stoves and stopping use on poor air quality days. Regulating firewood cutting as means of controlling emissions is a low priority because of difficulty in implementation.

17-10 The Baker Resource Area will comply with the Oregon/Washington Minimum Monitoring Standards, adopted in 1985, when monitoring land disturbing activities outlined in the Baker RMP. A discussion of monitoring was added to Chapter 2.

17-11 Monitoring, as described in Chapter 2, is part of the plan and will be carried out. Specific monitoring practices will be described in the upcoming Record of Decision and Rangeland Program Summary.

17-12 Appendix A has been revised to address your concern.

17-13 The role of monitoring is described in the monitoring section of Chapter 2. Also see Response 17-1.

17-14 The standard design features for locatable minerals were taken directly from 43 CFR 3809. The "may" originates from the 1872 mining law which requires a physical exposure of the mineral discovery on a mining claim. Reclamation of the discovery would deprive the claimant of their right under the mining law without due process of the law.

17-15 Threatened and endangered species are specifically addressed by 43 CFR 3809 and 3802. Other wildlife habitat is addressed under paragraphs II (A)(2) and II (B)(3)(e) of Appendix A. Also see Response 17-7.

17-16 Unacceptable damage to soils, slopes, or watersheds would generally consist of any circumstance that reduces site productivity or results in major long-term degradation of water quality. These circumstances would include landslides and debris avalanches, excessive soil compaction, topsoil erosion, dry raveling and depletion of organic matter, nitrogen and other nutrients.

Each proposed sale activity is preceded by an "activity plan" (Environmental Assessment) prepared by an interdisciplinary team of BLM specialists. This process identifies those silvicultural and logging practices that are inappropriate for any given area.

We view riparian areas and buffer strips as separate entities that don't necessarily coincide. Therefore, a clearcut of large timber on steep slopes might need a buffer strip of mature trees above a riparian area to stop rolling logs and to maintain shade. On the other hand, a light partial cut on flat topography may permit removing some timber from near the stream, with no designated buffer strip required, if the site-specific analysis indicates that there would be no impacts.

17-22 As stated in paragraph 7(c), specific buffer width will be determined by on-site analysis, and paragraph 7(a) provides for trees necessary for long term woody debris recruitment.

17-23 The cumulative effects of roads on wildlife are more easily determined, because these impacts are related to where and how much road is to be built. Cumulative impacts on water quality and fish habitat are dependent upon site-specific situations that are highly variable and will be addressed in site-specific analysis. See also Response 17-19.

17-24 See Text Revision, Chapter 3 for an expanded discussion on relations of this plan to Tribal rights.

17-25 See Chapter 3 - Text Revision for a correction to Table 7.

17-26 Footnote #7 for Table 29 does not relate to SHAs, but to a percent of the commercial timber lands to be under restricted harvesting due to multiple-use considerations. SHA areas were determined by the presence of unique values.

17-27 Off-road vehicle restrictions may be enforced by a number of methods, including fencing, signing, cooperative agreements with local law enforcement agencies, and public education. No specific data are available on efficiency of the various methods. However, we use the method that appears to be the most efficient for each situation.

17-28 The 10-year period for separating long-term and short-term impacts was selected because this is the time expected for full implementation of the plan. Fish as well as other resources have cycles that are not related to 10-year intervals.

17-29 See Response 17-14, which discusses this situation.

17-30 The most economically valuable fisheries in the planning area are located in the Grande Ronde River and its tributaries, Wildcat and Sickfoot Creeks, which support steelhead trout and Chinook salmon, and Cable Creek, a tributary of the John Day River that supports steelhead trout. The contribution of these fisheries from BLM-managed land to the local economics of communities along the river is important because it attracts anglers and recreationists. Its contribution to the regional economy is minimal.

17-31 See Text Revisions for page 71.

Soil/slope conditions that could "trigger" a decision not to clearcut (or construct roads, or perform any other specific practice) would include excessively steep slopes and stream headwalls, thin soils on bedrock, the presence of slumps and seeps on steep terrain, soils of decomposed granite, and any other condition that might indicate a potential problem.

17-17 The 15 year regeneration period for clearcuts stated in the Draft RMP/EIS was an error and should be 5 years. See Chapter 3, Text Revisions and Appendix A, Timber Harvest A.2.a.(2).

BLM policy may allow for a regeneration period of up to 15 years (BLM Manual 5251). The District Manager, as in the case of this RMP, can require a 5 year regeneration period for areas proposed for clearcutting and up to 15 years for areas proposed for shelterwood and partial cutting. No cutting will be done where reforestation requires more than 15 years.

17-18 The Standard Design Features for timber harvest listed in Appendix A apply to all BLM offices in Oregon. These are minimum standards that apply to every harvest action under a vast array of conditions and are intended to be general principles to follow. Special design features for any specific harvest action will be developed in the individual timber sale activity plan and environmental analysis.

17-19 Research* has shown that when more than 12-15 percent of a watershed is compacted, the frequency and duration of flows of sufficient magnitude to damage streambanks is increased. Proposed land disturbing activities will be reviewed through the environmental analysis process, and where this threshold is exceeded, a thorough evaluation of potential impacts to beneficial uses of water will be conducted to determine potential mitigating measures and alternate access designs.

* Harr, R. Dennis, 1976, Forest Practices and Streamflow in Western Oregon, USDA Forest Service General Technical Report, FPM-49, 189pp.

17-20 We consider the guidelines for buffer strips listed in the Draft RMP/EIS to be minimum standards; timber sale activity planning must meet or exceed these standards.

17-21 We agree that the importance of riparian areas is disproportionate to the areas they occupy. We also agree that riparian area management is a challenge to multiple-use managers. We don't agree, however, that paragraph 7(c) on page 106 is incorrect.

This provision about timber removal does not address removing timber from either buffer strips or riparian areas, but from the adjacent area. The amount of timber to be removed should be taken in context with the other provisions such as riparian area width, steepness of terrain, etc.

17-32 The guidelines for snag management have been revised in Appendix A, Timber Harvest A.8.A., which reads "that an adequate number of green trees or culls per acre to maintain a 60-70% visible level of cavity dependent wildlife". The following paragraphs now includes the following statement: depending on the forest type, 108-158 trees per 100 acres of various size classes from 10-20 inches diameter at breast height will be left standing, these guidelines are taken from "Wildlife Habitats in Managed Forests: The Blue Mountains of Oregon and Washington", Jack Ward Thomas, Technical Editor, Agricultural Handbook No. 553, USDA, Forest Service, 1979, 512 pages.

18 The Nature Conservancy

1234 Northwest 25th Avenue
Portland Oregon 97210
503 228-9561

June 30, 1986

Jack Albright
Bureau of Land Management
P.O. Box 987
Baker, Oregon 97814

Dear Jack,

Thank you for giving The Nature Conservancy the opportunity to respond to the "Baker Resource Management Plan: Draft Environmental Impact Statement". We have been actively following the progress of the management plan and have been impressed with the direction that the Resource Area has taken. I personally visited the Baker area last summer and spent a week with your staff examining a number of areas that have been included in the plan for special management status.

Overall we were quite pleased to see the list of potential special management areas displayed in Table 26. The list shows the diversity of the Baker Resource Area and thus its importance in terms of preservation of natural diversity. The areas listed as needing further study will be especially important to examine in the future to determine their protection needs. The Nature Conservancy has recommended a number of the proposed special management areas in the Baker R.A. and believes that those areas recommended for ACEC status in the Preferred Alternative are especially worthy of protection.

Several special management areas that were not recommended for protection in the Preferred Alternative remain as important sites for the preservation of natural diversity on the Baker Resource Area. These sites are discussed below and recommendations for each area are included.

Big Lookout Mountain: This area contains a wide diversity of communities that are important to wildlife on the Resource Area. The extensive aspen communities are of interest both to the wildlife and the research community. I believe that designation of the area as an ACEC would provide for more comprehensive planning and management without restricting resource use of the area.

Western Regional Office
156 Second Street
San Francisco California 94105
415 777-0541

National Office
1800 North Kent Street
Arlington Virginia 22209
703 841-5300

the Preferred Alternative section of the Draft EIS under the discussion of the Keating Riparian RNA/ACEC (p.57) it is mentioned that the riparian habitat would be maintained through intensive livestock management. The RNA committee strongly believes that the only appropriate riparian habitat management for RNAs is complete enclosure of livestock.

To protect riparian areas for all of the resource uses that require water and riparian plant communities, there should be a general restriction of livestock use in riparian zones. Alternative sources of water for cattle can easily be developed through wells and diversion of streams with adequate flow. The Prineville District has been experimenting with inexpensive Ram pumps to move water over short distances without outside power sources. This type of technology could be implemented as a substitute for direct access to riparian zones by cattle, allowing for the maintenance of riparian vegetation and the continued supply of high-quality water sources.

This concludes our comments on the "Baker Resource Management Plan Draft EIS". As I mentioned earlier it has been a pleasure working with the Baker BLM staff on the special management areas listed in the plan. The sites I visited with the staff were all of ACEC and RNA quality and deserving of designation. I look forward to visiting the Baker area this summer and hope to have time to examine several of the sites that have not yet been fully explored for ACEC and/or RNA potential.

Sincerely,

Dick Vander Schaaf
Dick Vander Schaaf
Public Lands Protection Planner

RECEIVED

JUL 2 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR

18-2

Little Lookout Mountain: This area is very diverse with good representations of wet meadow, bunchgrass, mountain big sagebrush, and forest communities. Designation of the area as an ACEC would, as above, provide for integrated planning and management with little restriction of resource use.

18-3

Table Rock: This area was brought to our attention too late to be included in the early stages of the planning process but clearly warrants immediate attention. It contains several examples of native plant communities including big sagebrush/bunchgrass and rigid sagebrush/bunchgrass that have yet to be represented in established Research Natural Areas. The area is ecologically interesting as it lies at the junction of the Owyhee Uplands Province and the Ochoco, Blue, and Willows Province. At present the area has received only light grazing due to a lack of water at the site, thus the plant communities are in essentially natural condition. The site has the potential to make an excellent RNA, unfortunately time has prohibited the RNA committee from examining the area. I would like to recommend that the area not be slated for any range improvements until a complete field examination of the site for RNA potential be conducted.

18-4

Juniper Canyon: This area is listed in Table 26 as one of the possible special management areas needing further study. Recent investigations of the area have turned up several sites that possess relatively high quality sand ecosystems that have all but disappeared in Oregon in the Columbia Plateau region. It is hoped that additional searches in this area might be able to delineate a site of this remnant natural community worthy of protection.

18-5

There were several other issues in the "Resource Management Plan" that we feel also deserve comments. The Nature Conservancy has long been involved in the preservation of habitat for rare, threatened and endangered species and realizes the need for continued work on this issue for public lands. The "Management Plan" direction for T & E species is good except that we feel there should be mention of the need for additional survey work, especially for rare plants. Also there is a need to coordinate rare species work (both plants and animals) with the Willows Whitman National Forest as lands are contiguous in many areas. Coordination could allow for the protection of populations in a more systematic fashion, resulting in the "freeing up" of some areas that might otherwise be restricted to resource use.

18-6

A final issue that The Nature Conservancy has been monitoring in Eastern Oregon is riparian habitat management. The Bureau has undertaken intensive inventories of riparian areas in several districts which has led to a greater understanding of management needs throughout the district. Accelerating the inventory process in the Baker Resource Area is the first step in protecting this all important resource. Rehabilitation should also be given a priority at a number of sites. I couldn't help but notice that in

18-1 The BLM recognizes that Big Lookout Mountain is a unique area that requires closely coordinated management of the diverse resources present. Big Lookout Mountain was not proposed for designation because diverse activities will be appropriately addressed under several integrated management plans. Activity plans or site-specific planning for Big Lookout Mountain include a completed Allotment Management Plan, plus a Habitat Management Plan, a Watershed Plan for a portion of the area, and a Forest Management Plan that are in progress. These activity plans will adequately address the resource management needs for the Big Lookout Mountain aspen areas.

18-2 No special management designation is recommended for Little Lookout Mountain because the proposed management direction to maintain the good condition and diversity of vegetation communities can be achieved under existing authorities and the proposed plan.

18-3 More information is needed on Table Rock before the area can be evaluated to determine if special management or ACEC designation is necessary. Range improvements already exist in this area. The natural values will be protected in the interim under existing authorities, pending the outcome of an examination to determine if the area is a potential RNA. Further study will be undertaken to see if the area meets the criteria for ACEC designation.

18-4 Juniper Canyon also needs further study. If additional data analysis indicates this area meets the criteria for special management, then an interim plan or planning amendment may be undertaken.

18-5 The proposed plan includes direction to inventory threatened, endangered and sensitive plants on a continuing basis and as funds become available. As indicated by the proposed RMP, all new surface disturbing actions require T&E plant and animal survey or evaluation. These inventory and survey efforts will be coordinated with the FS on adjoining BLM/FS lands.

18-6 Riparian habitat management efforts are ongoing and the management approach is continually re-assessed as new inventory and monitoring data are collected. As with the proposed Keating Riparian RNA/ACEC, each situation is evaluated in activity plans for individual management direction. This may or may not involve the use of livestock enclosures. If wildlife and water quality objectives are not attained through non-structural changes in livestock grazing systems, the enclosures may be necessary.

7/7/86

Dear Sir,

I would like to comment on BLM's management plan on the Powder River.

As a resident of Teton County, and I work for the City of La Barge at the wastewater treatment plant, I am interested in water quality. The Powder River has fallen on hard times.

It has become polluted, banks have caved in, less vegetation along its banks for shade so the water is warmer.

I know the government

will never have the courage to charge the stockmen a realistic fee for their cattle & sheep. So you would have funds to repair the damage that has been done.

But I would like to see some work being done. Rotating pastures more, fencing, planting willows, trees, along the river. Maybe land trading so the unit could be more efficient & useful for the public. Upper Big Creek would be a good place to start as far as trading and bringing it back. It's pretty bad now.

19-1

19-1 The Powder River Canyon will be designated as an Area of Critical Environmental Concern, which will require a site-specific management plan that will address the existing problems.

2.

This land belongs to all the people, not just the stock men, sawmill, miner. I believe we can all share in this.

Just 10 years ago the Powder was a good fishing stream. It could be again.

Thank you

George Schlegel

RECEIVED

JUL 08 1986

BUREAU OF LAND MANAGEMENT
SHEER, OR

Baker Resource Area
Bureau of Land Management
P.O. Box 68
Seattle, Washington 98166

Please accept my sincere appreciation for the information and assistance provided by the Baker Resource Area staff in the preparation of the Baker Resource Area Management Plan. The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

The plan is a comprehensive document that will guide the management of the Baker Resource Area for the next 20 years. It is a significant achievement and a testament to the dedication and hard work of the Baker Resource Area staff. I am confident that the plan will be a valuable tool for the management of the Baker Resource Area and will ensure that the area is managed in a sustainable and responsible manner.

20

JUL 14 1986

BUREAU OF LAND MANAGEMENT
FBI, OR

20-1

20-1 An analysis of the public lands in Oregon for potential wilderness designation is contained in the Draft Oregon Wilderness Environmental Impact Statement released for public review and comment in April 1985. Additional wilderness analysis will be addressed in a supplemental to that Draft, which will be completed by the end of 1986.



21

Washington - Oregon - Idaho - Montana



Mr. Charles Luscher
Oregon State Director
Bureau of Land Management
Box 2740
Portland, OR 97208

Re: Wild & Scenic Rivers in Oregon BLM Plans

Dear Mr. Luscher:

Friends of Whitewater and the Sierra Club have been closely following the planning process of Federal land management agencies in the Northwest. We are concerned that potential Wild & Scenic Rivers receive due attention in the plans. Enclosed are copies of previous correspondence which we have had with the Forest Service's Region 6 Office concerning the treatment of Wild & Scenic rivers in forest plans.

Oregon state BLM plans should determine the eligibility and suitability of potential Wild & Scenic rivers largely under BLM control as part of the planning process. This follows from the requirement of the National Environmental Policy Act (NEPA) that a federal agency consider all reasonable alternatives in its proposed action. A reasonable alternative for the management of all rivers listed on the Nationwide Rivers Inventory is protection as a Wild & Scenic river.

The Nationwide Rivers Inventory was compiled by the old Heritage, Conservation and Recreation Service, and is now maintained by the National Park Service. The rivers on the Nationwide Rivers Inventory were found to possess qualities which made them eligible to be part of our National Wild & Scenic Rivers System. President Carter, in his 1979 environmental message directed all federal land managing agencies to protect the eligibility of all rivers on the Nationwide Rivers Inventory until they could be studied for possible addition to the Wild & Scenic river system. He also directed the federal land managing agencies to study the eligibility and suitability of the rivers on the Inventory as soon as possible.

July 11, 1986

Please accept this letter as comments on the Baker Area Resource Management Plan.

The BLM, like the Forest Service, should, as part of its management planning process, study the eligibility and suitability of rivers on the Nationwide Rivers Inventory which are substantially under its control. It is, of course, more difficult for the BLM than for the Forest Service to determine which rivers are substantially under its control since its management area does not have boundaries as the National Forests do. However, it is not difficult to devise a rough test to allow BLM planners to determine if they should study a potential river for Wild & Scenic status.

The regulations developed jointly by the Dept. of Agriculture and the Dept. of Interior indicate that "a river segment is of sufficient length if, when managed as a wild, scenic or recreational river area, the outstandingly remarkable values are protected." For the administrative ease of the planning staff, we can quantify this by saying that it is generally necessary to protect 4-8 miles of a river to protect its outstandingly remarkable values.

As to substantial control, if the BLM manages 40% or more of the shoreline of a given stretch of a river, it is likely the largest government landowner along that stretch of river and is in substantial control of that section of river. Therefore, wherever the BLM manages 40% or more of the land along a 4-8 mile segment of a river on the Nationwide Rivers Inventory, it should evaluate the river segment for eligibility and suitability as a Wild & Scenic river as part of its management planning process.

This evaluation of rivers is particularly important where the adjacent section of the river within the boundaries of a National Forest has been recommended for designation as a Wild & Scenic river. This is the case in the Baker Area Resource Management Plan now under consideration. The Baker Area manages the majority of the land along the Grande Ronde river from the boundary of the Malheur-National Forest downstream to Wildcat Creek. The Grande Ronde is on the Nationwide Rivers Inventory and the Malheur-National Forest has recommended the section of the river within the Forest Boundary for designation as a Wild river. Since the adjacent portion of the river (above Wildcat Creek) under BLM management is in a beautiful canyon with no road access, it would also qualify as a wild river. The Baker Area Management Plan should make a recommendation with regard to Wild & Scenic protection of this section of river.

Similarly, the Baker Area manages a substantial amount of land along Joseph Creek which is also on the Nationwide Rivers Inventory. Its management plan should determine whether it exercises substantial control over any 4-8 mile

21-1

JUL 14 1986

BUREAU OF LAND MANAGEMENT
FBI, OR

PO Box 68 Seattle, Washington 98166

21-1

Section of Joseph Creek, and if so, evaluate the section for Wild & Scenic designation.

Therefore, we formally request that you direct the Oregon BLM offices to evaluate in their management plans the eligibility and suitability of sections of rivers on the Nationwide Rivers Inventory which are substantially under the control of the BLM.

Very Truly Yours,

Sierra Club

James Blomquist
James Blomquist,
Northwest Representative

Friends of Whitewater

Douglas A. North
Douglas A. North,
Chairman

21-1 This proposed Resource Management Plan recommends that the Grande Ronde River and Joseph Creek be established as study rivers under Section 3(a) of the Wild and Scenic Rivers Act, and that studies be completed to determine suitability. Should the study indicate the rivers, or segments thereof, are suitable for inclusion in the National Wild and Scenic Rivers System, Congress may designate them as wild, scenic or recreation rivers as appropriate.



United States
Department of
Agriculture

22

Forest
Service

Pacific Northwest
Research Station

Forestry Sciences Laboratory
3200 Jefferson Way
Corvallis, OR 97331

Phone to: 4060

Date: July 17, 1986

Jack Albright, Area Manager
Bureau of Land Management
1550 Dene St.
Baker, OR 97814

RECEIVED

JUL 14 1986

BUREAU OF LAND MANAGEMENT
DAWES, OR

Dear Jack:

I am sorry it has taken me so long to respond to the Baker DEIS and my visit to Baker in late May. I was hoping Angie Evendon would be able to look at the three proposed RNA's before I wrote, but she has been unable to find the time.

I appreciate the time your staff has given to the RNA proposals and the time we spent discussing the RNA program in general. I would like to go on record as supporting the Preferred Alternative which includes the Keating Riparian Area to be managed as three RNA's: Balm, Clover and Sawmill Creeks. I do have some more specific comments to make about the areas and about my meeting with your staff.

All three areas are primarily riparian zones. Domestic livestock has historically congregated in riparian zones and wrought, in many cases, devastating damage. We are fortunate that these three areas are in as good condition as they are. It is likely that complete removal of cattle from these areas would increase the extent of the riparian zone away from the streams. This would be most advantageous and an opportunity to study reclamation of what may have been the historical riparian zone. I do not think we know for sure whether there would be an increase in introduced or native species. This would have to be studied and monitored in some depth.

In our meeting on Wednesday morning Matt Kneisel, Mary Oman, Beth Walton, Elaine Joyal, Sam Montgomery and I discussed many RNA management issues--what is natural?, needs for fencing, reintroduction of fire, removal of grazing, monitoring, etc. We came to no definite conclusions for all the areas. What we did agree on was that in depth individual management plans will be needed for all three areas. The issues of grazing and fencing need to be resolved in a way which favors RNA values. Elaine has written an excellent management plan for Stockade Mountain RNA; this could be used as a model. We also agreed that the three areas are just a beginning in trying to understand riparian studies. Clearly more work needs to be done, as there are many miles of streams yet to be looked at. Until such time as that is done, we cannot really be sure if we have adequate coverage of baseline areas.

22-1

page 2

I hope to be able to return next summer to continue working on unfilled RNA cells for the Baker Resource Area. In the meantime if I can be of help in the writing of management plans, please let me know. I am very pleased with the response of the Baker Resource Area staff to the RNA program. I look forward to working with you in the future.

Sarah Greene

SARAH E. GREENE
Research Natural Area Scientist
Pacific Northwest Region

cc: Dick Vander Schaaf
Beth Walton
Rich Hanes



22-1 Management needs for the Keating Riparian RMA/ACEC will be evaluated in a site-specific activity plan, or plans, that will determine the specific management actions for each riparian segment. A number of management actions will be considered and evaluated, including those that are mentioned.



23 Oregon Hunter's Association Baker County Chapter

2170 First Street - Baker, Oregon 97814
July 14, 1986

Jack Albright
Area Manager
Baker Resource Area
1550 Dewey
Baker, Ore. 97814

Re: Baker Resource Management Plan

Dear Jack:

The OHA would like to take this opportunity to comment on the Baker Resource Management Plan. First of all, we feel that the plan is too general in nature as written. It would not be a good tool for forcing improvement of range land conditions.

- 23-1 As hunters we are especially concerned about the poor condition of deer winter range. As you know winter range is the critical link in maintaining our deer herds. We would like to see an active program to improve it. (More fire management, more reseeding for wildlife.) Secondly riparian zones on your district are in a generally poor condition and need to be improved. The BLM has printed many guidelines on these zones and these need to be implemented. We feel that the exclusion of livestock from these critical areas is the only realistic approach to rehabilitation. Thirdly, we support the concept of special management areas for such purposes as reintroducing Sharptail Grouse, a species whose decline can be directly attributed to overgrazing. We would like to see special consideration given to antelope and bighorn sheep so as to help those indigenous species return to the area in huntable numbers. Fourth, we feel that better monitoring of water quality and range conditions be implemented. Statements that say things are improving are not good enough. We want to see specific data that proves it. The OHA believes that actual on the ground improvements are the only thing that counts, and a good Plan should be designed for getting that done. Enforcement, even if it requires reductions in grazing is essential.
- 23-2
- 23-3
- 23-4

It is our opinion that only a minimum amount of effort has been put out by the BLM for wildlife habitat and wildlife protection. We would like to go on record as supporting the Natural Environment Protection Alternative.

Sincerely,

[Signature]
Dr. L. E. Kary, President
Baker Chapter, OHA

RECEIVED

JUL 14 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR

23-1 This proposed RMP recognizes the importance of deer winter range for maintaining deer herds in the planning area. The proposed plan places a high priority on the management of deer winter ranges, including the enhancement of forage. This ranking is identified under the Preferred Alternative in Appendix F, Table F-2 of the Draft RMP/EIS.

23-2 A great deal of our attention has been directed toward riparian management in the Ironside Bangeland Program Summary and this Proposed RMP. We have undertaken steps to reverse the conditions in deteriorated riparian areas through several management techniques. These include livestock enclosures, reduction in livestock, and restricting livestock grazing to early spring or fall. We are utilizing a number of physical rehabilitation techniques, such as planting of vegetation and construction of check dams. Our evaluation and specific riparian management is expanding to more areas on a priority basis and as funding allows.

23-3 We also support the reintroduction of indigenous wildlife in suitable habitats on public lands. The species you list are some of those that we will consider. The Oregon Department of Fish and Wildlife (ODFW) is responsible for introduction/reintroduction. They must identify and prioritize the species and habitat for the introduction program. BLM cooperates with ODFW to identify and provide suitable habitat for those species.

23-4 Monitoring is an important part of this proposed plan. A discussion of monitoring has been added to Chapter 2. Much of BLM's monitoring efforts are initiated and defined in site-specific plans such as Habitat Management Plans.

24 Powder River Sportsmen's Club

Incorporated
P.O. Box 162
BAKER, OREGON 97814

COMMENTS ON BAKER RESOURCE MANAGEMENT

PLAN EIS

- 24-1 | 1. The plan should increase emphasis on reintroduction of native species:
- Antelope
Sharptail Grouse
Mountain Sheep
- 24-2 | 2. There is not near enough emphasis on riparian restoration. This needs to be done by drainage. Small acreage enclosures are fine for data gathering, research, etc., but completely inadequate for real restoration efforts.
- 24-3 | 3. Lands have not been allocated by area as to their highest and best use. Some areas might need to have range uses take priority. Others might have watershed or wildlife as high priority. This doesn't seem to have been done.
- 24-4 | 4. We feel the need to strive for more diversity in seeding and plantings. We should have more mix of native species and less crested wheat mono culture.
- 24-5 | 5. The plan has not identified areas that would be most successful for seedings and other types of treatment in terms of soil fertility, moisture, temperatures, etc. Soil budget should emphasize economical efficiency and priority should be placed on determining what is the best site to plant to get the most for the money invested.
- 24-6 | 6. Adjustments still have not been made in AUMs to reflect that many areas are too steep to meet suitability criteria for range-land.
- 24-7 | 7. Wildlife has not been given enough priority in management direction. Where big game winter on BLM lands, restoration should receive high priority and winter range values must be enhanced.



- 24-1 See Response 23-3, which discusses reintroduction of wildlife species.
- 24-2 We agree that small acreage enclosures are not the answer to riparian management. Through this plan and the Ironside Rangeland Program Summary, we are and will continue to evaluate the riparian habitat in the Baker Resource Area. We will also continue to look for and apply needed management techniques for riparian areas.
- 24-3 Refer to Appendix F of the Draft RMP/EIS, which explains the development of alternatives using priorities for resources. Note that priorities for resources were adjusted from alternative to alternative. The priority ranking displayed for the Preferred Alternative for the Draft is the priority ranking for the proposed plan.
- 24-4 Providing a diversity in seedings and plantings is an integral part of this plan. Refer to the Wildlife and Fish Habitat Management section in the Draft RMP/EIS-Chapter 3 and Chapter 2 of this proposed plan.
- 24-5 This level of detail is normally determined at the activity or site-specific planning level, such as when we prepare habitat management plans or fire rehabilitation plans. The Soil Conservation Service is conducting a detailed soil survey for Baker County, which will be a tremendous step in this direction. As soil mapping is undertaken for other counties in the planning area this ability will be expanded.
- 24-6 Slope is not a factor usually considered when determining grazing suitability on Section 15 grazing lands. It is not feasible for BLM to control grazing on small scattered tracts within large private ranches (also see Response 26-1). In fact, livestock probably don't graze the steep slopes. They graze the less sloping lands, which in most cases is privately owned.
- 24-7 See Response 23-1 for a discussion of prioritization and identification of wildlife habitats.
- 24-8 The decision to not re-analyze Section 3 grazing lands in this plan was based on the recent completion of the Ironside Rangeland Program Summary and EIS. The decisions made in the Ironside RPS will continue to be implemented and monitored. The 3 year monitoring phase from 1981-1984 will be completed this year and the results will guide the next phase of implementation beginning in 1987.
- 24-9 A discussion on monitoring has been added. See Chapter 2, Monitoring, and also see Response 23-4.
- 24-10 Part of monitoring is acquiring baseline data to which future monitoring data can be compared.
- 24-11 Sufficient data were available to address issues formulated during scoping at the level undertaken in this RMP/EIS. However, BLM does recognize the need for additional data as noted for riparian zones and Special Management Areas.

COMMENTS ON BAKER RESOURCE MANAGEMENT PLAN EIS Page Two

- 24-8 | 8. The Ironside Plan may or may not be adequate in addressing Section 3 lands, but in spite of that, we feel Ironside Plan has not been implemented. Section 3 lands should have received full treatment in this EIS, *especially regarding riparian management.*
- 24-9 | 9. Monitoring in the past has been scarce to nonexistent. This EIS should place major emphasis on correcting this.
- 24-10 | 10. Like monitoring there is apparently a general widespread and severe lack of on ground raw data base. Major effort should be made to correct this, or there is no place to start monitoring, improving, etc.
- 24-11 | 11. This plan does not address lack of data as required by CED regulations.
- 24-12 | 12. The range of alternatives is insufficient at the amenity end. Where is the no grazing alternative?
- 24-13 | 13. The major problem with this EIS is that it is too general and is lacking in specifics for proposed actions. It is difficult to comment on because it is so generalized. It is questionable that this meets the courts' intent on requiring an EIS for grazing lands.
- 24-14 | 14. Special management areas must be allocated to the full extent possible, especially to aid in reintroduction of sharp-tailed grouse.

Powder River Sportsmen's Club

- 24-12 See Alternatives Eliminated From Detailed Study, Chapter 3 of the Draft RMP/EIS, pages 29-30.
- 24-13 Resource Management Plans are developed to provide resource management guidelines and allocations over a large area. These plans are implemented through site-specific management plans or activity plans developed under the RMP guidelines. A more detailed analysis is provided for each activity plan.
- 24-14 See Chapter 2, Special Management Areas, and Response 23-3.

25

July 12, 1986

Kimball - 1

Art Morigitt, Area Mgr
Baker Resource Area Office

RECEIVED
JUL 14 1986
BUREAU OF LAND MANAGEMENT
DALLAS, TX

Subj: Baker Resource Area RMP/EIS

After reviewing this document, I submit the following comments for inclusion in the hearing record.

25-1

1. Improve management of the Malheur-Grande Ronde System for inclusion in the National Wild and Scenic River System. Backcountry management of unroaded BLM lands within the Grande Ronde Canyon from Grouse Creek to Wetland Creek should keep this de facto wilderness.

25-2

2. The EIS should address threats in the Troy Basin of strip mining or slurry lines with water diversions. Quick private gain must not be allowed at public expense for degrading character of area for recreation and wildlife.

25-3

3. Protection of historic and pre-historic artifacts must be increased.

25-1 See Response 21-1 and Chapter 2, which discuss the recommendations for the Grande Ronde River.

25-2 See Chapter 1, page 6 of the Draft RMP/EIS, and Response 27-3, which discusses coal resources in the Troy Basin.

25-3 Protection of historic and prehistoric cultural resources is an integral part of this proposed plan (Refer to Chapter 2).

25-4 See response 23-2 for a discussion of riparian zone management.

Kimball - 2

25-4

4. Grazing must be managed to prevent running riparian zone - livestock should be excluded from six miles of streams and water habitat must be protected. The value of recreation - tourism and many values of clean water for outweigh value of grazing to the economy.

Joanna Rinson
James Kimball
17645 NW Rolling Hill Ln
Beaverton, OR 97006

26

EXTENSION SERVICE



Corvallis, Oregon 97331

July 9, 1986

RECEIVED

JUL 14 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR

TO: Jack Albright

FROM: Tom Bedell, Extension Rangeland Resources Specialist

SUBJECT: Draft EIS Baker Resource Management Plan

26-1

Upon reviewing the draft for provisions relating to rangelands, I have concluded that the preferred alternative best meets the objectives for the entire area. Since the grazing portion of the RMP only affects Section 15 leases, I suggest that the final EIS clearly state what Section 15 means as opposed to Section 3 and the relatively difficulty in managing small parcels of intermingled public and private land. Readers should know that intensively managed grazing can help produce or maintain highly desirable vegetation cover on riparian as well as upland areas. However, one must recognize the limitations BLM operates under in Section 15 administered leases and the relative difficulty of intensifying management in many circumstances.

Because of the tenuous nature of local economic dependency upon natural resources, including recreational use of such resources, BLM should insure that all reasonable provisions are made to improve economic stability. Even the loss of one job without its replacement in another sector can be important.

TEB:bc

cc: Norm Goetze
Bill KruegerAgriculture, Home Economics, 4-H Youth, Forestry, Community Development,
Entry and Marine Advisory Programs, Oregon State University,
United States Department of Agriculture, and Oregon Counties cooperating

27

RECEIVED

JUL 14 1986

13606 NW Milburn St.
Portland, OR 97229
11 Jul 1986BUREAU OF LAND MANAGEMENT
BAKER, ORJack Albright, Area Manager
Baker Resource Area Office
1350 Devey
Baker, OR 97814

Subject: Baker Resource Area RMP/EIS

I have reviewed the subject document and have the following comments for inclusion in the hearing record and the FEIS.

My area of greatest familiarity, expertise and concern is the Wallowa-Grande Ronde River. Therefore most of my comments will focus on that area.

I am an ecologist, employed as a Regional Environmental Planner by the Oregon Department of Transportation since 1974. I have canoeed, hiked and extensively photographed the entire 90-mile section of the Wallowa-Grande Ronde River System from Minam to the Snake River every year since 1978. My 40-minute multi-image / sound portrait of the river has been widely shown, and I am currently planning a publication on the same subject. I am deeply committed to the preservation and protective management of this waterway, all natural systems on which it's quality depends, and the indigenous resources which it supports. It is my objective to encourage all others to share that commitment.

27-1

1. I certainly support the management of the Wallowa-Grande Ronde System, under the RMP, for eventual inclusion in the National Wild and Scenic River System (the Oregon Scenic Waterway System could easily be mentioned as well). I wish to encourage BLM, as well as the USFS, to go beyond the merely obligatory management requirements mentioned in the EIS, and to use the most effective means available to ensure that these designations indeed take place. I think it is particularly important to pursue this while we are still between energy crises. Things are not going to get easier.

I am aware and greatly concerned about the problems of both current and future recreational overuse and abuse, and my experience on the Grande Ronde fully verifies the brief descriptions of the usage problems listed on page 23, col. 2 of the EIS. But it is also clear that we will never solve these problems by allowing the degradation of one more river of such extraordinary intrinsic values as the Wallowa-Grande Ronde.

In addition to the above, I recommend that backcountry management be seriously considered for unroaded BLM lands within the Grande Ronde Canyon from the National Forest boundary near Grossman Creek to Wildcat Creek. This would be consistent with current management in most of the de facto wilderness upstream in the National Forest. The scenic transition between Grossman and Wildcat creeks is

26-1 We agree that it is important to clearly distinguish the management opportunities and constraints related to Section 3 and Section 15 grazing areas. Under Section 3 of the Taylor Grazing Act, livestock grazing is permitted on public lands that have been organized into grazing districts. Section 3 lands are generally the larger tracts of public lands, and often make up a significant part of ranching operations. They offer the greatest opportunities for intensive management. Section 15 lands are generally scattered, small tracts of public lands, that generally form a very small part of a ranch operation. These isolated tracts are often surrounded by or fenced within private lands, and have very low potential for intensive management. See also Chapter 3 of the draft RMP/EIS, Page 29 and 30.

Craig Markham - Baker RMP/EIS

Page 2 of 4

27-1

spectacular, and must be respected accordingly in the RMP. Acquisition of remaining private inholdings along the south bank should also be considered. Cooperative, complementary management of state holdings along the north side of this valley also needs consideration / coordination.

27-2

2. On first reading, the "Preferred Alternative" does appear to chart a sensible, albeit vague course for managing the study area. But I must express some reservations. I can understand that some broad strokes of the brush are necessary to keep a document like this reader-accessible. I write them for a living myself. However, the treatment does leave me with some concerns about just how, and even if, implementations of certain site-specific actions and environmental mitigation will in fact take place -- particularly in the face of the continual, and often deviative, economic and political pressures of the region.

I systematically compared corresponding paragraphs of the alternatives presented, and found the use of broad generalities to be a recurrent question. In many cases, it seemed that the distinctions among the alternatives could easily be blurred, given a little administrative "artistic license", when it comes time for implementation. What, for example, is the difference between "aggressively pursuing" wildlife reintroduction under the Natural Environment Protection Alternative (p. 49, col. 2, parag. 7) and the Preferred Alternative's "Reintroduction ...would be pursued..." (p. 54, col. 2, parag. 2)? Could this be interpreted to mean that in the latter case BLM might pursue reintroductions on a more casual basis, or as something of an afterthought? Without elaboration or reference to a fairly specific range of measures to be taken, this remains unclear.

27-3

3. P. 22, "Leasable Minerals" -- The potential for coal/lignite development in the Troy Basin seems to have been passed over lightly. A sudden change in the Middle East could bring strip miners scurrying to make a quick buck at major expense to the character of the basin and the Grande Ronde River. I found no mention of Utah International's (General Electric) lignite interests in the basin. They could turn the basin upside down, create huge water diversions from the river for slurry lines and invade the hills with unwanted roads to unwanted pit mines.

27-4

4. P. 23, Table 17 -- I note that high proportions of all of the recreation uses listed are dependent on waterways in the study area, and can only be enhanced by the maintenance of high environmental standards. The economic spinoffs from this are significant, as is evident from the figures on page 27 of the EIS.
5. P. 24, "Cultural Resources" -- I have become increasingly concerned at the vandalism and theft of historic and prehistoric artifacts along the Grande Ronde and Snake Rivers. Each year I have watched the deterioration of old farm implements, as they disappear part-by-part, and the disappearance of old homesteads by torch or bulldozer (e.g., Roy School, Washington). I was glad to see the

- 27-4 historic marker signs placed by BLM at a site above Wildcat Creek. They may at least give pause to the "innocent" thoughtlessness of some by making it clear that disturbance of these cultural remains is wrong. But how to deal with premeditated vandalism is obviously a different ball game. I'd like to skin them alive myself. My blood boils when I see the latest shattered remains of the petroglyphs between Amodin and Hellera Bar. I wish we had an easy answer for protecting these sites.
- 27-5 6. P. 27 -- The \$60,000/year value of maintaining existing livestock grazing levels at the expense of riparian zones seems particularly piddling and unjustified in the context of the values derived from active recreation (\$825,000) and Tourism (\$13.5 million), particularly when the latter depend, to some degree, upon values derived from healthy riparian zones.
- 27-6 7. P. 30, "Requirements for Further Environmental Analysis" -- I wish to receive notification of all site-specific resource projects and documents relating to the Wallowa-Grande Ronde basin, Joseph Canyon, and Hells Canyon.
- 27-7 8. P. 33, "Recreation" (Common to All Alternatives) -- I support study and designation of the Grande Ronde, Joseph Creek and additional portions of the Snake River as Wild and Scenic Waterways, as well as interim BLM management to support their eligibility. The Minam - Grande Ronde Section of the Wallowa River, which provides continuity with the Oregon's existing designation of the Minam River as a State Scenic Waterway should also be included under this treatment. Minam is also the most highly-used access to the Wallowa-Grande Ronde System.
9. I am not aware of any Washington state or local protective designations for the lower Grande Ronde. It is therefore doubly important that this magnificent section of river receive protective federal management.
10. pp. 49-57, "Natural Environment Protection Alternative" and "Preferred Alternative" -- At least in terms of the broad generalities presented in the EIS, I see little reason why most, if not all, of the language for the Natural Environment Protection Alternative (dare I call it the NEPA?) should not be adopted as the Preferred Alternative. Here are a couple examples:
- 27-8 Grazing Management. Exclusion of livestock from six miles of streams (and associated riparian zones?), and 30 AUM's, seems a microscopic price to pay for the benefits of riparian protection. The last couple of years of severe winters, with the associated major losses of wildlife are a testament to the utter necessity of full protection for wintering habitats and food supplies. The idyllic grassland setting of Wildcat Creek alluvial plain at the Grande Ronde looks like a dried up golf course by late July, having been eaten up and trampled by cattle. Areas like this can mean life or death for area wildlife.

- 27-1 See Response 21-1 and Recreation Management in Chapter 2, for BLM's recommendations for the Grande Ronde River.
- 27-2 Resource Management Plans are developed to provide resource management guidelines and to prioritize resource allocations over a large area. These plans reflect the type of priorities and emphasis as in the example cited in the comment. Activity plans allow BLM to analyze management direction in a more detailed manner on a much smaller area.
- 27-3 The planning area is not located within a coal production region. Leasing outside of a coal production region is initiated by an application (refer to 43 CFR 3425.1-5). Once an application is received, the area under application would be studied using the four planning screens described on page 7 of the Draft RMP/EIS. Refer also to Chapter 1, pages 6-7 of the Draft RMP/EIS.
- 27-4 Prehistoric and historic cultural resources on public land in remote areas are monitored for condition and protection as often as permitted by available funding. Public cooperation in protection of these resources is essential. The petroglyphs and schoolhouse cited are not on BLM lands. Vandalism on non-federal lands is beyond the control or jurisdiction of the BLM.
- 27-5 The economic figures for livestock grazing and recreation are not comparable because those for livestock represent only the Section 15 lands (50,400 acres) in the planning area. The planning area includes another 379,000 acres of Section 3 grazing lands. Economic factors were only one of many factors guiding the development of the final plan, which placed a high priority on management of riparian areas (see Appendix F of the Draft RMP/EIS).
- 27-6 You will be added to the mailing list to receive notification of all site-specific resource projects and documents relating to the Wallowa-Grande Ronde basin, and Joseph Canyon Snake River. There are no BLM lands in the HCNRA.
- 27-7 See Response 21-1 and Chapter 2, Recreation Management for a discussion of BLM's recommendation for the Wallowa and Grande Ronde Rivers.
- 27-8 See Response 26-1 for a discussion of livestock management on Section 15 grazing lands. No public lands managed by BLM occur in the Wildcat Creek alluvial plain.
- 27-9 See Appendix F of the Draft RMP/EIS and Appendix A of this document that discuss the application of mitigation to all alternatives.
- 27-10 Although the Draft RMP/EIS placed increased emphasis upon the area within 1/4 mile of the river, this was not meant to be the only area to be considered for special management. In the proposed plan management direction has been recorded to indicate that special visual management protection will be implemented for all public lands within the river corridor viewshed. Activity plans for the river will address appropriate protection and compatible uses within the viewshed corridor.

27-9

27-10


Riparian Management. The NEPA statement that "Surface disturbing activities would not be allowed unless impacts could be mitigated over the long term" should be included in the Preferred Alternative.

Special Management Areas. The Preferred Alternative compromises the very concept of an SMA. Maintaining a mere 1/4-mile buffer strip along the Grande Ronde is less than a drop in the bucket. Imagine a 1/4-mile strip in the photograph on page 41 of the DEIS and it should be eminently clear just how silly a dimension this would be. Management of the listed areas should indeed be special, so make it that way. The Natural Environment Protection Alternative language should definitely be adopted for the treatment of these areas. In addition, The Hunt Mountain SMA should be designated for back country management, consistent with the abutting Elkhorns Wilderness Study Area.

I am left with the impression that a central difference between the NEPA and Preferred Alternative is the seriousness of the proposed approaches to environmental protection. I must question the validity of such a stance. We are only borrowing this land, and we must apply ourselves seriously to the job of returning it to the next generations in good condition, rather than selling it off for a few AUM's or nuggets or furnace fodder.

Thank you for the opportunity to comment on the proposed RMP/EIS. Please keep me informed of any future developments relating to this matter.

Yours Sincerely,



Craig Markham



28

OREGON-CALIFORNIA TRAILS ASSOCIATION

Officers

President:
Thomas H. Hunt
850 Oak Grove Road
Palo Alto CA 94304
(415) 941-0616

Vice-President:
Barbara Mager
8881 W. 72nd Terrace
Overland Park KS 66204
(913) 722-1804

Secretary:
Dr. John A. Linschler
784 Union Street
Garden City MO 64501
(816) 334-0102

Treasurer:
James F. Bowers
460 S. Oak Street
Lakewood CO 80526
(303) 987-4466

Legal Counsel:
Robert L. Berry
1100 Pacific Street
Omaha NE 68104
(402) 339-3632

Directors

Chairman:
Gregory M. Prosser (1989)
Box 42
Laramie WY 82007
(314) 784-3821

Counsel to the President:
Charles W. Martin (1989)
411 N. 51st Street
Omaha NE 68132
(402) 558-4488

Robert P. Beyer (1989)
882 Chest Drive
Pawnee NE 68394
(402) 588-1388

James F. Bowers (1989)
Donald Buck (1989)
1138 River Court
Burlingame CA 94007
(408) 758-0621

Karen A. Bush (1987)
Box 147
La Barge WY 82425
(207) 286-2281

Ms. Catherine M. Galloway
2108 NE 29th Place (1987)
Portland OR 97214
(503) 238-1185

Thomas H. Hunt (1989)
James P. Johnson (1989)
125 S. Hooper St.
Port Collins CO 80502
(303) 484-3487

Dr. John A. Linschler (1989)
Marion J. Miller (1987)
8850 W. Plymouth Drive
Lakewood CO 80128
(303) 578-4837

Barbara Mager (1987)
Mary E. Mueller (1989)
1118 Silver Oak Court
San Jose CA 95128
(408) 985-7989

Headquarters: Box 42 / Gerald MO 65027 / (314) 784-3801
La Grande, Oregon
July 13, 1986

Mr. Jack Allbright
Bureau of Land Management
Baker Resource Area Office
1550 Dewey
Baker, Oregon 97814

Dear Jack:

It is about time that I responded to your Resource Management Plan and keep my "name in the pot".

I may be too late even now but memory serves me that July 15 is the deadline. If not do what you are committed to.

Have been pretty darn busy and no sign of any slack down the road that I can see. Am certain you have been there too.

Really from my visits with Mary Dean and various other activities there is very little for me to comment on at this time. I believe there has been some good comment and Mr. Hunt our President has commented and perhaps Catherine Galloway from Oregon City, who is a board member may have submitted comment. My only major remark would be that I would like to see your maps enhanced with the route of the Oregon Trail shown on them in the future. Archeological sites should be held in confidence for protection as well as graves sites. In addition the trail should be marked and awareness made for its protection on lands under BLM jurisdiction.

There seems little more that I can add at this time so will make it short. Best to all of you there.

Looking forward to assisting you in any way possible.

Sincerely

Bob Rennella
R.E. Bob Rennella

Box 746
La Grande, Oregon 97850

RECEIVED

JUL 15 1986

BUREAU OF LAND MANAGEMENT
Baker, OR

28-1 The maps accompanying the RMP show the locations of the Oregon Trail crossing BLM lands. Other BLM resource maps show the entire route of the Trail. The need for additional public information maps will be evaluated in cooperation with State and other Federal agencies.

28-2 BLM policy requires confidentiality to protect all cultural sites.

28-3 The Oregon Trail is physically marked where it crosses BLM public lands. See also response 2-1.

28-1

28-2

28-3

29 July 10, 1986

Jack Allbright, mgr.
Baker Resource Area- B.L.M.
1550 Dewey
Baker, OR 97814

Dear Jack:

Tye One On Flycasters is a newly organized group of Union County Flycasters. Interested in submitting input on the Baker Resource Management Plan, EIS. We consist of approximately twenty members and their families, and are interested in promoting fishery habitat.

One of the goals of our club is to rehabilitate the Powder River Canyon, back to historic fishery levels. We promote voluntary catch and release with barbless hooks from 1/2 mile below Thief Valley Dam to Hwy 203 (approx. 10 miles) until fish levels have an opportunity to re-establish themselves.

Riparian Zones throughout the Powder River Canyon need protection against over-grazing of cattle. We emphasize protection of riparian zones for both fisheries and wildlife enhancement.

29-1

As sportsmen we feel the recreational commodity of our fisheries far outweighs any other environmental or economic resources these areas can produce. We urge the BLM to incorporate the Environmental Protection Alternative #2.

Throughout the resource area plan, riparian zones and fisheries have been clearly identified. We would like to express concern for protection of these specific natural resources for our future generations. The recreational value is worth more to our local economies than the subsidizing of cattle grazing with taxpayer's dollars.

29-2

Joseph Canyon's anadromous fish and native trout population need special habitat protection and riparian zone rehabilitation due to past over-grazing of our lands.

We hope you will take our concerns as constructive input and incorporate provisions into the final resource plan.

As a side-note, we are looking for speakers for our monthly meetings and would like to have a representative from your office speak to us on the chosen alternative.

Cordially,

Mark Gomez

Mark Gomez, president
Tye One On Flycasters
1219 "W" Avenue
La Grande, OR 97850

Susan Hughes

Susan Hughes, member
Tye One On Flycasters

cc: Oregon Senators Hatfield and Packwood Oregon Trout
Oregon House Representatives: La Grande Observer: file

29-1 This plan proposes to designate the Powder River Canyon as an Area of Critical Environmental Concern. Under that designation site-specific plans will be written to emphasize the protection and management of riparian areas.

29-2 BLM lands on Joseph Creek are proposed for designation as an Outstanding Natural Area. Specific management guidelines to be developed will emphasize maintaining the naturalness of the area, including wildlife and fish habitat.

30 July 13, 1986
Jack Albright, manager
Baker Resource Area- BLM
1550 Dewey
Baker, OR 97814

Dear Jack,

I am writing to offer suggestions concerning the Baker Resource Management Plan E.I.S. I fully support the general trend of the Preferred Alternative (PA) in that increased emphasis is being placed on recreation and wildlife habitat.

Fisheries habitat should receive stronger emphasis for protection and enhancement. Wild salmon, steelhead and resident trout populations need to be inventoried and specifically managed. Native fish require and deserve much more stringent habitat management. I urge the B.L.M. to specifically target habitat that supports native anadromous and resident fish.

30-1 Anadromous fish and resident trout habitat not in excellent condition should be enhanced. Examples include the Grande Ronde and Powder Rivers, and Joseph, Swamp, Chesnimus and Little Sheep Creeks. All contain critical anadromous and/or resident fish habitat and need to be managed as such on a priority basis. Surface disturbing activities should not be allowed and grazing must be eliminated from riparian areas.

30-2 The B.L.V. should push hard for inclusion of the Grande Ronde River and Joseph Creek in the Wild and Scenic Rivers program. I float the Grande Ronde extensively and have hiked in Joseph Canyon. I urge strong efforts to acquire lands in both canyons so that federal management can be more effective in preserving these areas.

30-3 The Special Management Areas in the PA would better reflect their unique characteristics if management criteria were closer to those in the Natural Environment Protection Alternative. These areas are outstanding and management goals and actions should reflect this. Though not mentioned in the E.I.S., terraces below Troy on the Grande Ronde River support small stands of dead ponderosa pine that are used extensively by Lewis' woodpeckers for nesting. I have never seen so many of this increasingly uncommon species in one place. Special management would be beneficial.

30-4 Please consider additional enhancement of wildlife habitat, such as mule deer, that is presently in moderate or worse condition. Habitat required by old growth forest constituents is also in need of attention. With so little old growth left in northeastern Oregon it is imperative to consider carefully its future.

Thank you for the opportunity to comment.

Rick George
Rick George
505 "M" Avenue
La Grande, OR 97850

cc: Oregon Senators
Oregon Representatives
file



Boise Cascade

31 Timber and Wood Products Group

Northeast Oregon Region
P.O. Box 610
La Grande, Oregon 97850
(503) 963-3141

July 14, 1986

Mr. Jack Albright
Area Manager
Baker Resource Area Office
1550 Dewey
Baker, OR 97814

Dear Mr. Albright:

Please consider the following comments as Boise Cascade Corporation's input response for the Baker Resource Management Plan and Environmental Impact Statement, dated March 1986.

We support the Commodity Production Alternative. This alternative will provide the necessary commodities to aid and maintain economic and social stability in Northeast Oregon. The following points are directly in relation to the Preferred Alternative:

31-1 1. Forage Production - The BLM should increase forage if it can. Leasing of the unleased lands will increase the available forage and increase the amount of money received by the BLM and returned to the counties. The local ranching economy relies on BLM grazing for a portion of the total available AUM's. This should be maintained at the highest possible level.

RECEIVED

JUL 15 1986

BUREAU OF LAND MANAGEMENT
BAMER, OR

30-1 BLM administers relatively little fisheries habitat in the planning area. BLM lands are usually scattered parcels along rivers and streams with the majority of the land owned by private individuals. We are proposing to manage these BLM tracts when possible for fisheries. To maximize fisheries requires cooperation among the various landowners, which we are proposing to do. Each area with fisheries potential will be evaluated in site-specific habitat plans to determine the management and protection necessary. We propose to maintain all riparian zones that are in good to excellent condition, which are by far the majority (see page 14, Table 10 of the Draft RMP/EIS). We will emphasize recovery of those in fair condition.

30-2 See Response 21-1 for BLM's recommendations for the Grande Ronde River.

30-3 This information is appreciated and will be added to our wildlife inventories. It will be used in our site-specific planning for the Grande Ronde River.

30-4 A recommendation for old-growth habitat has been included in this proposed plan. See Response 32-5.

31-2

2. Riparian Zones - of the 80% of the major perennial stream in the BLM planning area which have been inventoried, most of the habitat is in good condition. This indicates that current BLM management practices are adequate and that no additional regulation is necessary. The Standard Design Features, outlined in Appendix G are more than adequate to protect Riparian Zones.

31-3

3. Cooperative Wildlife Management - The 3700 acres of Cooperative Wildlife Management areas should be allocated to deer and elk, if necessary to meet wildlife agreements. No special emphasis is necessary for enhancing wildlife habitat. Current habitat quality and diversity should be maintained. New wildlife projects should be encouraged but not at the expense of range, mineral or forest management.

31-4

4. Land Disposal - The BLM should dispose of all unmanageable lands. The zone 1 lands within Boise Cascade ownership should be available for outright purchase or trade. These lands are highlighted on the attached copy of Map 7.

31-5

5. Public Land Development - All publically owned lands should remain open for mineral exploration and development. The seasonal oil and gas leasing restriction should not be instituted on a broad-brush

31-5

basis for 201,720 acres due to wildlife considerations. There could be some seasonal restrictions on a case-by-case basis if necessary.

6. Sustained Timber Harvest - The 10 year level should be sustained at 29MMBF from the 26,026 acres of commercial forest land. This volume is important to maintaining jobs and community stability in Northeast Oregon.

31-6

7. Recreation Sites - These should be redesigned to accomodate increased recreational use.

31

8. Off-Road Vehicles - The 122,820 acres identified in the Commodity Production Alternative are sufficient to maintain resource protection. Additional seasonal closures could be considered for Joseph Creek ONA and the other SMA's designated, but total closure is not necessary.

31-8

9. SMA/ACEC Designations - The current direction alternative does not designate any SMA/ACEC Designations. However, special resource values will be protected under existing authorities and management direction. We agree with this approach.

Please feel free to call me if you have questions concerning these comments.

Thank you for the opportunity to comment on your proposed plan.

Sincerely,



Robert C. Messinger
Assistant Timberlands Manager

RCM/jwmp

- 31-1 BLM strives to increase vegetative cover on public lands, not only for livestock but for wildlife forage and watershed protection. Leasing of unleased lands would not increase forage production. The total income derived from leasing unleased land (764 AUMs) would be about \$1,000, which would be divided between five counties and the federal government. The economic gain to the ranching community would be equally insignificant (see page 69, Table 40 of the Draft RMP/EIS).
- 31-2 We agree, but we want to enhance the riparian habitat that is in less than good condition.
- 31-3 The overall purpose of this plan is to allocate resources and to provide the basic guidance that allows, to the maximum extent possible, management compatibility of all resources in the planning area.
- 31-4 BLM's objective is to improve management of public lands through land tenure adjustment. Boise Cascade's land exchange interests are on file for consideration at the time exchange proposals are prioritized. Lands in the retention zone are not available for sale, but may be available for exchange.
- 31-5 Seasonal restrictions on oil and gas development were not applied on a broad-brush basis. They are the result of locally specific needs during critical periods. Most of the seasonal restrictions are due to critical winter range requirements of big game and Beld Eagles wintering areas. Wildlife are particularly sensitive to disturbance during these critical periods.
- 31-6 Current budget allocations are not sufficient to expand recreation facilities, however if funding becomes available, recreation facilities would be expanded to meet the recreation demand.
- 31-7 OHV closures and limitations for Special Management Areas including Joseph Creek are not based on seasonal needs, but are intended to provide year-round protection of sensitive resources or unique values. These values include riparian vegetation watershed, scenic quality, geologic systems, wildlife habitat, and cultural resources.
- 31-8 Existing authorities provide for protection of unique or sensitive resources. However, designation of the Special Management Areas is intended to provide protection and special management that goes beyond the existing authorities.



32

Department of Fish and Wildlife
506 S.W. MILL STREET, P.O. BOX 3503, PORTLAND, OREGON 97208

July 14, 1986

Jack Albright
Area Manager
Baker Resource Area Office
1550 Dewey
Baker, Oregon 97814

RE: Draft Baker Resource Management Plan

Dear Mr. Albright:

The Oregon Department of Fish and Wildlife has reviewed the Baker RMP/EIS dated March 1986. Our review focused on the proposed federal action and its impact on fish and wildlife resources.

As a result of that review, the Department prefers the Natural Environment Protection Alternative as the program that would provide for maintenance and enhancement of fish and wildlife resources in the Baker Resource Area.

Comments regarding specific elements of the Plan are included below.

Grazing Management

A comparison of the changes in grazing allotments over the past five years was made using the 1981 Ironside Grazing Management EIS. Our concern is for the grazing reductions called for in the 1981 document that do not appear to have been implemented.

Reduction guidelines under Grazing Use Adjustments on page 19 of the Ironside Record of decision state:

"...Adjustments in livestock use, other management actions, or a combination of both will be made the first year of the five year implementation period to assure significant progress in meeting the vegetative objectives identified in the Proposed Action of the Ironside EIS. Additional grazing adjustments will be made in the third and fifth year if monitoring studies indicate a need to further balance livestock use with available forage.

Deviations from the schedule of grazing adjustments, as established in the final grazing decision, must be based on additional data of at least equal quality to that upon which the original schedule

RECEIVED

JUL 16 1986

BUREAU OF LAND MANAGEMENT
DAHER, OR

Jack Albright
July 14, 1986
Page -2-

was based. If the monitoring studies information indicates a need to modify the final decision, either upward or downward, the District Manager will issue an amended decision following consultation with the affected livestock operator and publication of an updated RPS."

When a comparison is made between the original 1981 Ironside plan and the 1986 RMP, it is apparent that a majority of proposed increases in livestock AUM's have been made while comparatively few of the proposed decreases have been made. In the cases where some of the proposed decreases have been addressed, most have only been partially reduced, thus falling short of their five year forage reduction proposals. Under the BLM Preferred Alternative, lands would continue to be issued at current levels.

The questions, therefore, remain: If the objectives of the 1981 Ironside plan have yet to be realized (with respect to forage allocation), how can a decision to continue grazing leases at current levels be justified?

What additional data... "of at least equal quality to that upon which the original schedule was based..." indicates a departure from the 1981 schedule?

Table 4, p. 8

Correction - ODFW owns 470 acres of Little Sheep W.A. and manages 40 acres of USFS land by agreement.

Riparian Habitat, p. 14

From the Department's perspective, much of the riparian habitat in the Baker County portion of the management plan could be improved. Specific examples include: Pritchard Creek, Morgan Creek, Lookout Mountain drainages, Sardine Creek, Sesley Creek, the Burnt River, Dark Canyon and Deer Creek.

In addition, we recommend continued maintenance of existing livestock enclosures on streams in the Area, with increased riparian enhancement management techniques applied to improve these important habitats. Continued riparian habitat inventory and monitoring on all streams in the Resource Area should be included in any selected alternative.

Threatened, Endangered or Sensitive Species, p. 15 Table 11

Peregrine Falcon is not listed. While no documented nest sites occur in the Management area, Peregrines are present during migration.

Mr. Jack Albright
July 14, 1986
Page -3-

Woodlands, p. 16

Old growth timber inventory information is not included in the plan. Quality, quantity and location of this habitat type should be included. If none exists, then present plans should include a percentage of existing forest land designated for old growth management. The BLM "Woodlands" designation would be appropriate as these areas are defined as "Woodlands are forest lands of low productivity that are not included in the commercial forest allowable harvest base." The Department maintains that: "between 5-15 percent of the forest acres be maintained as old growth habitat, well distributed by elevation, aspect, slope and location is needed to provide minimum self sustaining populations of wildlife species preferring old growth". (Wildlife Habitat Considerations in Forest Operations, ODFW, DOF 1985)

Wildlife Habitat Inventory, p. 17

The BLM use of prescribed burning to set back plant succession thereby improving forage quality and quantity for big game use is to be commended and encouraged.

Steps should be taken to improve and protect key winter ranges by diversifying the habitat. Plant structure should include introduction of forb and browse species such as alfalfa, curl leaf mahogany, four wing saltbush, etc., to break up the monoculture aspect of crested wheatgrass seedings. Crested wheatgrass provides only limited spring and fall use by big game species. Cover needs by wildlife on winter ranges can be provided by juniper and sagebrush plantings.

Summer range improvements could include prescribed burning to provide for habitat diversity. Specific areas in need of this technique include Big Lookout and Pedro Mountains.

Table 26 p. 35

The Department supports the designation of special management areas listed in this table.

Land Tenure Adjustment, p. 113-120

Comments and suggestions for land tenure actions in the Baker planning area:

There appears to be an opportunity to block up lands along Joseph Creek SMA and Grande Ronde SME through exchange of isolated blocks with private landowners. Also, the Nature Conservancy is attempting to acquire prairie land in the Zumwalt area for Columbian Sharp-tail restoration and to preserve a portion of the largest natural prairie in the Northwest. BLM parcels in this area are of high wildlife value and should be carefully reviewed prior to any disposal plans.

Mr. Jack Albright
July 14, 1986
Page -4-

The following parcels have the potential to be high value Columbian Sharp-tail habitat and should be specifically examined with this potential use in mind prior to any disposal decision.

Description	Acres	
T2N R4SE Sect. 36 (some)	40	(Salmon Creek)
T1N R4SE Sect. 9 NE SE	40	
T3N R4SE Sect. 34 SE NW	40	(Near Salmon Creek)
T2N R4SE Sect. 17 SW SW	40	
T1S R4SE Sect. 8 NE NW	40	(East Crow Creek)
T2N R4SE Sect. 6 Lot 10	26.68	(Calf Creek)

The following parcel is adjacent to the Little Sheep Wildlife Area. It also has creek frontage on Little Sheep Creek, an important steelhead stream. ODFW has a satellite fish hatchery a short distance downstream from this land. The area is potential bighorn sheep range and mule deer winter range and supports many other wildlife species.

Description	Acres
T1S R4SE Sect. 16	200

The following parcels are isolated but close to the Little Sheep W.A. and could be offered for exchange to block up public lands around Little Sheep Wildlife Area.

Description	Acres
T1S R4SE Sect. 3 Lot 13 SW SW	80
T1S R4SE Sect. 17 NE SW	40
T1S R4SE Sect. 30 Lot 4	40
T1S R4SE Sect. 31 Lot 1	34.73

The following parcels are adjacent to USFS land and could be transferred to that agency for management or possible exchange to block up public holdings.

Description	Acres	
T3N R4SE Sect. 35 NW NW	40	
T2N R4SE Sect. 21	160	(Near HCNRA)
T2N R4SE Sect. 28	240	
T2N R4SE Sect. 34 SE SW	40	

The following parcels are within the boundaries of several large ranches and could be offered to the owners in exchange for other lands adjacent to the Hells Canyon NRA in the Snake River Unit.

32-8

This land is high value winter range for mule deer and elk. It is also potential bighorn sheep habitat and near the proposed Grizzly Ridge sheep release site.

Description	Acreage
T1N R48E Sect. 6 SE SE	40
T1N R48E Sect. 17	
T1N R48E Sect. 18 W SE	120
T2N R48E Sect. 20 NW	180
T2N R47E Sect. 26	120
T2N R47E Sect. 27 SE NW	40

6. The following parcels are on Joseph Creek or Tamarack Creek and should be retained or exchanged for like land because of high fish and wildlife values.

Description	Acreage	
T5N R45E Sect. 1 Lot 1	40	(Tamarack Creek)
T5N R45E Sect. 10	80	(Joseph Creek)

The Department appreciates the opportunity to comment on this plan.

If you have any questions regarding the above comments, please feel free to contact me or members of our Baker wildlife district office - Jerry Grover/Dick Humphreys, Oregon Department of Fish and Wildlife, Rt. 1, Box 211, Baker, Oregon 97814 - telephone # 523-5832.

Sincerely,

Anthony J. Faust
Anthony J. Faust
Staff Biologist
Habitat Conservation and Planning Division

tfs

c NE Region
Wildlife Division
Humphreys/Grogan

32-1 The Ironside NIS is a distinct planning document and is not re-addressed by this RMP. Refer to Chapter 2, Purpose and Need. However, even though 1987 represents the first year of the scheduled 5-year use-adjustment period specified in the 1981 Ironside Record of Decision, some reductions in grazing use have already been made. Monitoring is continuing, and additional use adjustments will be phased in over the next 5 years, in accordance with 43 CFR 4110.3(b).

32-2 The text has been revised. See Chapter 3, Text Revisions.

32-3 Riparian habitat on the identified streams and existing enclosures were analyzed in the Ironside NIS, and are scheduled for management analysis through habitat management plans.

32-4 Special management needs for Peregrine Falcon were not included in the plan since it is a migrant and no areas have been identified where protection is needed.

32-5 BLM recognizes the importance of old-growth forest as a component of wildlife habitat. Although current data indicate that very little old-growth timber remains on BLM lands in the planning area, the proposed plan will manage a substantial amount of the old growth that does exist as old-growth habitat.

The proposed plan excludes from timber harvest 3,977 acres (13.6 percent) of the total suitable commercial forest land. Most of this area is inaccessible, has never been logged, and would probably classify as old-growth habitat.

Also, we propose to manage for old-growth habitat about 5 percent (1,268 acres) of the remaining 25,353 acres of suitable commercial forest land that will be available for harvest. These 1,268 acres will be managed in all-aged stands to maintain their old-growth characteristics. They will also be managed to maintain the distribution of old-growth habitat in the planning area.

32-6 We will include your concern in the site-specific plans (Habitat Management Plans) for these areas.

32-7 We also recognize the need to "block up" lands along Joseph Creek and the Grande Ronde RMA's. We have worked with the Nature Conservancy in the past, and will continue to work with them on the Summit area.

32-8 The lands that were identified as having wildlife values have been assigned to the retention zone.

33 Oregon Natural Resources Council
— formerly the Oregon Wilderness Coalition —
Eastern Oregon Field Office, Box 9, Prineville, Oregon 97669 (503) 420-3714

Baker Resource Area Manager
1550 Dewey
Baker, OR 97814

The Oregon Natural Resources Council (ONRC) appreciates the opportunity to comment on the Draft Baker Resource Management Plan (DRMP).

RECEIVED

JUL 17 1986

BUREAU OF LAND MANAGEMENT
ONRC, OR

33-1 There is a lack of alternatives, which does not satisfy NEPA requirements. The alternatives are also skewed toward development and do not represent a full range of options.

The Natural Protection Alternative with even more emphasis on other resources than domestic grazing and timber is a clear choice. Little or no timber cutting should be allowed and domestic grazing should decrease in certain areas immediately.

33-2 All special management areas should receive full protection and timber harvesting and domestic grazing should not occur. Cattle grazing on the Grande Ronde River bottom is excessive and must be stopped.

33-3 Recreation would be enhanced and economic benefits of recreation far outweigh any cattle benefits. The Grande Ronde River Canyon should receive a national wild and scenic river recommendation.

33-4 Sharp-tailed grouse re-introduction at Little Lookout Mountain is favored and total habitat protection is essential. Homestead WSA should be recommended as wilderness.

33-6 Riparian Management should totally protect all live streams from domestic grazing. Grazing damaged areas are found throughout the Baker Resource Area and rehabilitation must be top priority for riparian, wetlands and meadow areas. The benefits to other resources from quality riparian areas would be phenomenal. Inventories have not even been done on some streams and management decisions are being made now with a lack of information.

33-7 Big game winter range must be identified and managed to rehabilitate the range and big game preferred plant species. Domestic livestock should be severely limited or excluded. Wildlife forage allocations should be dramatically increased.

Range management should emphasize native vegetation including future seedings and rehabilitation of past seedings.

33-8 Timber data is lacking to make valid choices. ONRC recommends no cut backcountry and wildlife allocations for Hunt Mountain in the Elkhorns and the Big and Little Lookout Mountain areas. These isolated timber stands are worth far more in a natural condition for watershed.

33-8 Wildlife and recreation than for timber management. Other stands provide more benefits to other resources. There should be little or no timber harvesting on Baker BLM lands.

33-9 ONRC opposes nearly all privatization of public lands. These lands have greater multiple use public values than becoming a part of someone's ranch. In fact, lands should be purchased by BLM especially along the Grande Ronde River to maintain this public treasure.

33-10 There is an obvious lack of monitoring process to keep track of implementation success. The Final EIS must contain a valid and achievable monitoring system that the public can scrutinize. ONRC questions whether all the grazing decreases in the Ironside Rangeland EIS have been fully implemented?

ONRC hopes our comments will be utilized and that the Baker Planning process will meet the intent of applicable laws and agency policies.

Sincerely,

Tim Lillebo

Tim Lillebo

ONRC Northeast Field Coordinator

33-1 All alternatives considered in the Draft DRMP/EIS were multiple-use as required by the Federal Land Policy and Management Act of 1976. As required by the National Environmental Policy Act of 1969 and Council on Environmental Quality Regulations for implementing that law, we explored and evaluated all reasonable alternatives for this plan. Refer also to Chapter 3, pages 29-30 of the DRMP, for an explanation of Alternatives Eliminated from Detailed Study.

33-2 Special management area designation as an ACEC does not necessarily exclude other multiple uses. Uses compatible with protecting and maintaining special values are allowed. Specific management needs and prescriptions or restrictions will be evaluated and implemented for each area through activity plans that will be developed for every designated ACEC.

33-3 BLM's recommendation for the Grande Ronde River is explained in Chapter 2, Recreation, and Response 21-1.

33-4 Providing habitat for sharp-tailed grouse reintroduction is a priority of this plan. The best locations for reintroduction will be determined through cooperative studies. See also response 23-3.

33-5 See Response 20-1.

33-6 BLM's recommendations for riparian zone management are contained in Chapter 2, Riparian, and further discussed in Response 5-2.

33-7 Your concern is discussed in Response 23-1.

33-8 BLM frequently uses timber harvest to enhance wildlife habitat. No timber harvesting will occur without a site-specific analysis of the effects of the harvest on wildlife and watershed as well as other resources. See also response 32-5.

33-9 BLM's objective is to improve the manageability of public lands. Appendix F lists land transfer alternatives in order of preference. Sale of public lands is a low priority. The objective of land exchanges is to create more manageable blocks of public land or acquire strategic lands that will enhance existing public land resources.

33-10 A discussion on monitoring has been added to Chapter 2. Also see Response 32-1 and 24-8.

RECEIVED

JUL 17 1986

BUREAU OF LAND MANAGEMENT
Range Ecology Group CHEN, ON
La Grande, Oregon 97850
July 16, 1986

Jack Albright
Area Manager
Baker Resource Area Office

Our review of the Baker Resource Management Plan EIS of March 1986 leads us to make the following comments:

- 34-1 The EIS is superficial; it offers a limited scope of alternatives for management strategies.
- 34-2 Degradation of the public lands through mining is not sufficiently addressed and little notice is taken of the negative effects of "hobby mining."

- 34-3 No alternatives offer a decrease of grazing abuses and concomitant recovery programs for riparian zones and water quality. Although there may be a "general acceptance" of livestock grazing on public land (page 30), there is also a national concern for the preservation of our heritage. The alternatives offer an increase of 764 AUM's that is 25 times greater than the negligible decrease of 30 AUM's proposed in one alternative. This gives the BLM the appearance of being a branch of the cattle industry. Such attention to the demands of an elite wealthy few at the expense of 250 million citizens discredits any suggestion there is an adherence to the multiple-use philosophy.

- 34-4 On page 63 is the questionable suggestion that "Timber harvest would alter plant succession and INCREASE the vigor and variety of forest vegetation." This is followed by the contradiction that "Long term losses in vegetation associated with the construction of permanent roads would occur." Such inconsistencies support our earlier statement that the EIS is superficial and incomplete.

- 34-5 As clearly stated on p. 62: "Improving the condition of stream riparian areas by restricting cattle grazing can result..." in improved water flow as well as less polluted water. Your proposals contradict your own information or worse, imply a disregard for good stewardship of the public land.

There are numerous similar inconsistencies and weaknesses in the EIS; obviously, a more responsible document could have been prepared.

- 34-6 Our group proposes that the very narrow focus on so-called commodities be abandoned and a true stewardship approach be adopted. A number of alternatives revolving around water, soil and vegetation enhancement programs should be generated. It is widely recognized that the public range has been abused and degraded. The only ethical and practical course is one that aims toward restoration.

We also propose you set aside more land for truly valuable "commodities" such as gene pool preservation, soil retention, fishery enhancement, wildlife habitat protection, recreation sites and trails, carbon-dioxide cycle vegetations, and scenic attractions.

For the public lands,

John E. Barry
John E. Barry
Chairman, Range Ecology Group
Box 566
LAGRADE, OR. 97850

34-1 For a discussion of the formulation of alternatives see Response 33-1.

34-2 Surface mining produces impacts of a similar type, regardless of the size of operation. Mining impacts were analyzed in Chapter 4 of the Draft RMP/EIS.

34-3 The Natural Environment Protection and the Preferred Alternatives address these issues.

34-4 Cutting trees reduces competition between plants for nutrient/soil moisture and allows more sunlight for growth of plants. The vegetation removed for road construction is lost for the period of time the road is maintained. This does not constitute inconsistency, but describes different impacts from different actions.

34-5 Riparian Management is discussed in Response 5-2.

34-6 Watershed was ranked higher than all other commodity resources in the proposed plan (See Appendix F of the Draft Baker RMP/EIS and see Chapter 2, Watershed). This is also the ranking for the proposed plan. See also Response 33-1.

35



DEPARTMENT OF THE ARMY
WALLA WALLA DISTRICT, CORPS OF ENGINEERS
BUILDING 308, CITY COUNTY AIRPORT
WALLA WALLA, WASHINGTON 99055
July 23, 1986

REPLY TO
ATTENTION OF
Planning Division

Mr. Sam Montgomery
RMP/EIS Team Leader
Bureau of Land Management
Baker Resource Area
1550 Dewey
Baker, Oregon 97814

Dear Mr. Montgomery:

This letter is in response to the Draft Environmental Impact Statement (DEIS) concerning the Baker Resource Management Plan that was sent to our North Pacific Division office. The document was forwarded to us for review. This letter also reflects the previous discussion between you and Mr. W. E. McDonald concerning this proposal.

We have reviewed the DEIS for the Baker Resource Management Plan. Our review did not reveal any effects on navigation or hydropower development. Moreover, we reviewed the project for flood control and hydrologic concerns and found no inadequacies.

We appreciate the opportunity to review your environmental document. Should additional information be required, please contact Mr. W. E. McDonald at (509) 522-6627 or FTS 434-6627.

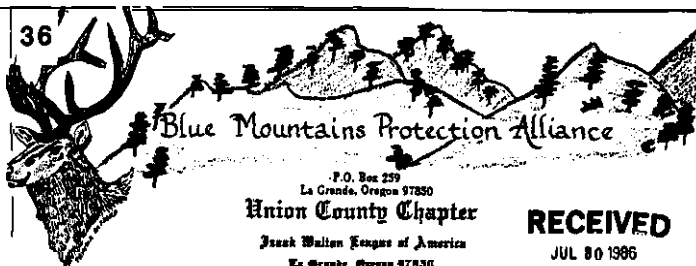
Sincerely,

John L. McKern
John L. McKern
Chief, Environmental
Resources Branch

RECEIVED

JUL 24 1986

BUREAU OF LAND MANAGEMENT
BAKER, OR



Union County Chapter

Isaak Walton League of America
La Grande, Oregon 97850

July 28, 1986

RECEIVED

JUL 30 1986

BUREAU OF LAND MANAGEMENT
SANDIA, NM

Jack Albright
Baker Resource Area Office
1550 Dewey
Baker, OR 97814

Dear Mr. Albright:

Blue Mountain Protection Alliance and Union County Chapter of Isaak Walton League (BNPA-UC-IWLA) are not able to support any of your proposed alternatives. There are not enough differences in the Natural Environmental Protection Alternative and your preferred alternative. Mineral, grazing, timber managements are still being over emphasized. Table 1 summary verifies this fact. A cut back of only 764 AUMs, 20 MMBF timber is unacceptable. Grazing, timber harvest and mineral emphasis are degrading all the other more valuable resources.

A goal to protect all riparian zones should be implemented without any additional, very costly, fencing. Cattle, off-road vehicles, ORUs, and such that put soil into streams, should be eliminated. Presently fenced pastures that have riparian zones

should not be grazed in the spring or summer. Some light grazing could be considered in late October through December on these protected ecosystems. Some of these areas should have herders to help disperse the animals for better late season forage utilization. The benefits to all the multiple-use resources would be overwhelming. Experiments on this kind of grazing managements have shown cattle gains can be as much as 24% more with stock excluded from sensitive areas during hot summer and early fall months. The Starky Experimental Forest Studies have proved this as well as many of your own BLM experiments. We want you to promote more pounds to red meat can be raised on a given land base and not numbers of AUMs that has been an outdated technique for many years.

The Powder River Canyon between Thief Valley Reservoir and Keating Valley, approximately 10 miles in length, is one of your best all resource areas that you could implement such a management strategy without any additional expenses. Wildlife winter range and fisheries could be rehabilitated to their fullest potential. Enclosed map identifies areas of your RNA that could be managed as we have suggested. You could identify and manage hundreds of other riparian areas your special resource people know on the RNA. Soil, water quantity and quality, all vegetation protection, will benefit with only a small percent reduction in AUMs.

It is absolutely absurd for the Baker Resource Area to have a 27 MMBF annual timber harvest. You have clobbered some of your best stands, which were really only marginal anyway and without

2

successful regenerations. Your timber managers have mismanaged these stands just to benefit their advancement to better Oregon and California Districts. Examples of this mismanagement are identified on maps enclosed. Baker Resource Area timber management should be on an unregulated basis and then only on a uneven age selective harvest program. This is the only way other resources can be sustainable--even flow too.

The proposed land exchange between the Forest Service and BLMs Baker Resource Area looks to be practical and feasible. We probably will support this effort with some additional suggestions.

We are requesting both public agencies support the conservationists and Senator Packwood's wilderness legislation that includes Homestead, Sheep Mountain and possibly more of McGraw roadless areas. Both Forest Service and BLM proposals on these areas are not as satisfactory as Mr. Packwood's wilderness bill. All domestic grazing on these roadless areas is very damaging to all other more valuable resources and should be removed from grazing. Maybe some intensive herder managements could be considered on the gentler benches of the middle part of McGraw? Will you be sure the Forest Service knows how we feel about McGraw's management.

Twelve special management areas of 44,935 acres is not generous enough on the needed restrictions to bring them to their full resource potential.

Grande Ronde, 9,715 acres, needs to compliment the other existing public agencies' lands that join together. Keating

riparian RNA/ACEC lands of 3,120, 80 and 185 acres for RNA is a fraud proposal. Jerry Allen, Supervisor of Wallowa-Whitman has promised us he would work closely with BLM in this area to get wildlife winter range rehabilitated. We are requesting this be done immediately. Sharptailed grouse should be reintroduced on all BLM lands, and grazing be removed to accomplish these reintroductions. Grazing is responsible for the loss of this species so it is not asking too much to remove cattle, now, because they are not an endangered species like Sharptail grouse.

Hunt Mountain should be promoted to be wilderness along with the rest of the Elkhorn Range. We appreciate the reintroduction of goats to the area and the good fire management on Hunt Mountain, but it's not enough.

Mining activities on Hunt Mountain and the Elkhorn Range should be completely restricted. Mansville and other mining companies have not found valuable enough deposits to develop, so please recognize this mountain range's real values by leaving it in its natural state.

We have touched somewhat on most of these other 12 special management areas somewhere in this letter and enclosed maps.

We realize Baker Resource Area doesn't have many areas involved in the Columbia River fisheries enhancement effort. But those that are, we request full cooperation with this program. We expect you to compensate for this situation by promoting a resident fishery throughout the rest of the Resource Area.

4

The Isaak Walton League has a Public Lands Restoration Task Force (PLRTF) dedicated to the removal of grazing for wilderness and public in the near future. The League will be working with Baker Resource Area and the Vale District on this effort.

Respectfully,

Loren W. Hughes, Sr.
Director, BLM
Regional Director, FWLA

- 36-1 Alternative formulation is discussed in Response 33-1.
- 36-2 Riparian management is discussed in Response 5-2.
- 36-3 See Response 29-1 for a discussion of our recommendations for the Powder River Canyon.
- 36-4 BLM continues to improve the management of public forest land. This is exemplified by the most recent forest inventory used to determine our sustained yield figures. We are convinced that implementation of this plan will result in a healthy forest that will enhance a multitude of other resources. The 27 MMSP harvest is for a 10 year period, which would be an average of 2.7 MMSP per year.
- 36-5 Nine SKAs are proposed under this plan. As information becomes available, additional possible Special Management Areas can be proposed and evaluated to determine if they meet the criteria for special management.
- The proposed Grande Ronde ACEC proposes cooperation with adjoining Forest Service and State lands for special management of wildlife and recreation values. The existing Riparian RMA/ACEC acreages include the principal vegetation communities in natural condition that can be specially managed for research/education and wildlife habitat, including winter ranges.
- 36-6 This plan proposes to identify lands suitable for sharp-tailed grouse reintroduction. This will be done in cooperation with the Oregon Department of Fish and Wildlife.
- 36-7 Hunt Mountain is proposed for designation as a Special Management Area/ACEC. Specific management direction will be developed in a plan to be done on the area.
- 36-8 See response 17-7.



37

Department of Transportation
PARKS AND RECREATION DIVISION
625 TRADE STREET SE., SALEM, OREGON 97302
August 7, 1986

William C. Calkins
Bureau of Land Management
Vale District Office
PO Box 700
Vale, OR 97918

Dear Mr. Calkins:

We have reviewed the 1986 Baker Resource Management Plan. Our major concern is the Grande Ronde River. As you know, the Grande Ronde has been identified as a potential scenic river by both federal and state governments. The state conducted a Scenic Waterway Study of the Grande Ronde, but designation was rejected due to local opposition. A copy of the study is enclosed. The U.S.F.S. Wallum-Whitman 1986 Proposed Land and Resource Management Plan recommends "wild" designation of 18 miles of river (from within the national forest boundary to 1/2 mile below Grossman Creek).

In planning for such designation and subsequent management of the Grande Ronde, close coordination between the U.S.F.S. and the BLM is very important.

In the interim, we agree with BLM's plan to maintain "scenic" eligibility of the Grande Ronde. However, under the preferred alternative, incompatible uses would be excluded only within 1/4 mile of the river. In those areas where the canyon widens, 1/4 mile exclusion may be insufficient to maintain the desired visual characteristics. A more appropriate approach would be that described in the Natural Environment Protection alternative where incompatible uses would be excluded within the river canyons.

We regret that we are late in making these comments, but hope they might still be included in your planning. Thank you.

Very truly yours,

John E. Lilly
Assistant Administrator

JEL:DE:jn
08630

Enclosure

- 37-1 The proposed plan will increase protection of BLM lands adjacent to the Grande Ronde River. See also Response 27-10.

Appendices

Appendix A Standard Design Features

Introduction

The following list of standard design features includes project design features, reclamation measures and procedures that will be applied as stipulations or requirements on proposed projects. The standard design practices will be used as mitigation measures throughout the planning area to avoid or reduce undesirable impacts. Because it is not possible to anticipate every kind of project that might be proposed, other practices not listed below might also be applied to particular projects at the discretion of the authorized officer.

Minerals

I. General

No “unnecessary or undue degradation” of Federal lands will be allowed. “Unnecessary or undue degradation” means surface disturbance greater than would normally result when an activity is being accomplished by a prudent operator in a usual, customary, and proficient manner. The evaluation of “unnecessary or undue **degradation**” takes into consideration the effects of operations on other resources and land uses, including resources and uses outside the area of operations. Failure to initiate and complete reasonable **mitigation** measures, including reclamation of disturbed areas or creation of a nuisance, may constitute unnecessary or undue degradation. Failure to comply with applicable environmental protection statutes and regulations will constitute unnecessary or undue degradation.

II. Locatable Mineral Development under the Mining Laws (43 CFR 3809 and 3802)

A. All Operations

1. All operations, whether casual, **under** a notice, or by a plan of operations, shall be reclaimed.

2. All operations, including casual use and operations under either a notice or a plan of operations, shall be conducted to prevent unnecessary or undue degradation of the federal lands and shall comply with all pertinent Federal and State laws, including but not limited to the following:

a. **Air Quality.** All operators shall comply **with** applicable Federal and State air **quality** standards, including the Clean Air Act (42 U.S.C. 1857 et seq.).

b. **Water Quality.** All operators shall comply with applicable Federal and State water quality standards,

including the Federal Water Pollution Control Act, as amended (30 U.S.C. 1151 et seq.).

c. **Solid Wastes.** All operators shall comply with applicable Federal and State standards for the disposal and treatment of solid wastes, including **regulations** issued pursuant to the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act (42 U.S.C. 8901 et seq.). All garbage, refuse **or waste** shall either be removed from the affected lands, or disposed of or treated to minimize, so far as is practicable, its impact on the lands.

d. **Fish, Wildlife and Plant Habitat.** The operator shall take such action as may be needed to prevent adverse impacts to threatened or endangered species, and their habitat that may be affected by operations.

e. Cultural and Paleontological Resources.

Operators shall not knowingly disturb, alter, injure, or destroy any **scientifically** important **paleontological** remains of any historical or archaeological site, structure, building or object on Federal lands.

Operators shall immediately bring to the attention of the authorized officer any **cultural and/or** paleontological resources that might be **altered** or destroyed on federal lands by **his/her operations**, and shall leave such discovery intact until told to proceed by the authorized officer. The authorized officer shall evaluate the discoveries brought to his/her attention, take action to protect or remove the resource, and allow operations to proceed within 10 working days, after notification to the **authorized officer of** such discovery.

The Federal Government shall have the responsibility and bear the cost of investigations and salvage of cultural and paleontology values discovered after a plan of operations has been approved, **or where** a plan is not **involved**.

3. Maintenance and Public Safety

During all operations, the operator shall maintain his structures, equipment and other facilities in a safe and orderly manner. Hazardous sites or conditions resulting from operations shall be marked by signs, fenced, or otherwise identified to alert the public in accordance **with** applicable Federal and State laws and regulations.

4. Applicability of State Law

Nothing shall be construed to effect a preemption of State laws and regulations relating to the conduct of operations or reclamation on federal lands **under the** mining laws.

B. Notice of Operations, 5 Acres or Less

The following standards govern activities conducted under a notice:

1. Access routes shall be the minimum width needed for operations and shall follow natural contour, where practicable, to minimize cut and fill.
2. All tailings, dumps, deleterious materials or substances, and other waste produced by the operations shall be disposed of to prevent unnecessary or undue degradation in accordance with applicable Federal and State Laws.
3. At the earliest feasible time, the operator shall reclaim the **area disturbed**, except to the extent necessary to preserve evidence of mineralization, **by taking** reasonable measures to prevent or control on-site and off-site damage to the Federal lands.
4. Reclamation shall include, but shall not be limited to:
 - a. Saving of topsoil for final application after reshaping of disturbed areas have been completed;
 - b. Measures to control erosion, landslides, and water runoff;
 - c. Measures to isolate, remove, or control toxic materials;
 - d. Reshaping the area disturbed, application of the topsoil, and revegetation of disturbed areas, where reasonably practicable; and
 - e. Rehabilitation of fisheries and wildlife habitat.

C. Plan of Operations - Prevention of Unnecessary or Undue Degradation

1. When an operator files a plan of operations of a significant modification that encompasses land not previously covered by an approved plan, the authorized **officer** shall make an environmental assessment or a supplement to identify the impacts of the proposed operations on the lands, and to determine whether an environmental impact statement is required.
2. In conjunction with the operator, the **authorized** officer shall use the environmental assessment to determine the adequacy of mitigating measures and reclamation procedures included in the plan to insure the prevention of unnecessary or undue degradation of the land. If an operator advises he/she is unable to prepare mitigating measures, the authorized **officer**, in conjunction with the operator, shall use the environmental assessment as a basis for assisting the operator in developing such measures.

3. If, as a result of the environmental assessment, the authorized officer determines that there is "substantial public interest" in the plan, the authorized officer shall notify the operator, in **writing**, that an additional period of time, not to exceed the additional 80 days provided for approval of a plan is required to consider **public** comments on the environmental assessment.

III. Oil and Gas Leasing

A. Standard Stipulations

Standard stipulations are listed in Sec. 8 of **Offer to Lease and Lease for Oil and Gas Form 3100-I 1**. They are:

Lessee shall conduct operations in a manner that minimizes adverse impacts to the land, air and water, to cultural, biological, visual, **and** other resources, and to other land uses or users. Lessee shall take reasonable measures deemed necessary by lessor to accomplish the intent of this section. To the extent **consistent** with lease rights granted, such measures may include, but are not limited to, modification to siting or design of facilities, timing of operations, and specification of interim and final reclamation measures. Lessor reserves the right to continue existing uses and to authorize future uses upon or in the leased lands, including the approval of easements or **rights-of-way**. Such uses shall be conditioned so as to prevent unnecessary or unreasonable interference with rights of lessee.

Prior to disturbing the surface of the leased lands, lessee shall **contact lessor to** be apprised of procedures to be followed and modifications & reclamation measures that may be necessary. Areas to be disturbed may require inventories or special studies to determine the extent of impacts to other resources. Lessee may be required to complete minor inventories or short term special studies under guidelines provided by lessor. If in the conduct of operations, threatened or endangered species, objects of historic or scientific interest, or substantial unanticipated environmental effects are observed, lessee shall immediately contact lessor. Lessee shall cease any operations that would **result** in the destruction of such species or objects.

B. Special Stipulations

Special stipulations are attached to oil and gas leases to provide additional protection for fragile **areas or** critical resource values. Examples of special stipulations are seasonal restrictions for critical wildlife habitat and No Surface Occupancy to protect special **values or** fragile areas.

Timber Harvest

I. Sale Planning

A. Timber.

Planning for a timber sale must precede actual **field** layout of the sale. General needs and goals for a particular area are established years in advance through the Timber Management Activity Plan (TMAP), the five-year timber sale plan and other long-range plans. Such plans are more sharply focused as certain tracts are selected for **inclusion** in short-range plans such as annual timber sale plan, and environmental assessments (EA) are prepared for **specific** sale areas. Once an area has been selected and approved for inclusion in the annual sale plan, the field forester, with the aid of resource specialists, translates the management plan and objectives into **reality** on the ground, making adjustments as necessary to best meet the stated plans and objectives and environmental protection requirements. Planning and preparation for all sales shall consider the following:

1. Long-Range & Short-Range Planning. Prior to field layout of a proposed sale, the Area Manager reviews, with the foresters assigned to the sale layout task, the following:

a. Timber management activity plan including **EAVEIS** for TMAP.

b. Five-year timber sale plan.

c. Management plans for special use areas and other activities, e.g., **HMPs**.

d. Annual timber sale plan including **EA** for proposed action.

e. Road transportation plan for area, including planned **design** standards.

f. **Public access plan for area and current status of access.**

g. Terms and conditions of right-of-way agreements and easements for area involved.

h. Condition and status of cadastral surveys in area.

i. Status of inventories for occurrence of sensitive, threatened, or endangered plants and animals; status of inventories of cultural resources.

j. Notification requirements of Corps of Engineers under Sec. 404 of Federal Water Pollution Control Act if work involves discharge of dredged or fill material in navigable waters; applicability of any general permit issued pursuant to Sec. 404.

k. Applicability of **coastal** zone management programs pursuant to the Coastal Zone Management Act.

2. Silvicultural Practices. Silvicultural practices must be used that best meet the management goals and related land-use **prescriptions** and assure prompt regeneration of the forest. Selective cutting, shelterwood cutting, clearcutting or their various modifications are available **options**.

a. Clearcutting should not be used as a cutting practice where:

(1) Soil slope or other watershed **conditions** are fragile and subject to unacceptable damage.

(2) There is no assurance that the area can be adequately restocked within 5 years after harvest.

(3) Aesthetic values outweigh other considerations.

b. Clearcutting should be used only where:

(1) It is **silviculturally** essential to accomplish the relevant forest management objectives.

(2) The size of **clearcut** blocks, patches, or strips are kept at the minimum necessary to accomplish silvicultural and other multiple-use management objectives. Cutting **units** should not exceed 40 acres in **normal** circumstances. More than 40 acres may be appropriate for salvage of an area already environmentally damaged by fire, insect or wind, or where larger **cutting units** would minimize road construction and other actions which would result in greater adverse environmental impact on the total forest.

3. Sale Design. Cutting areas should be shaped and designed to blend as much as possible with the natural terrain and landscape. The **cutting** area should minimize the effect on the total forest vista with due regard for future harvesting, impacts of road construction and other relevant factors.

4. Roads. Roads and other facilities **should** be kept to a minimum, and where needed to fulfill short and long term management needs, should be located, designed and **constructed** to the standards necessary **for the** total land use and resource values involved.

a. Location of Logging Roads. Roads should be so located to minimize the **risk** of **material** entering adjacent streams or other waters.

(1) Road will be **fit** to the topography so that a minimum alteration of natural features will be necessary.

(2) Roads will be located on stable terrain such as moderate side slopes or ridge tops wherever possible

When roads must cross potential unstable terrain, the road should be engineered to the extent **necessary** to prevent unacceptable damage. Where sidecasting of waste material during road excavation will over the downslope soil with rock and subsoil incapable of supporting productive vegetation, consider end-hauling waste material to stable areas of more moderate topography.

(3) Logging roads will be located away from wet or marshy areas and other wetlands, meadows, riparian areas, and stream banks. Otherwise, necessary drainage and streambank protection would be provided.

(4) The **number of** stream crossings would be minimized. When it is practical streams would be crossed at right angles to the main channel.

(5) Areas of vegetation would be left or established between roads and streams.

(6) Roads will avoid being located through crucial **deer and** elk winter range, when feasible.

(7) Roads will avoid being located through non-forest or non-commercial forest habitats with high wildlife values.

b. Road Design. Consistent **with** good safety practices and intended use, each road will be designed to the minimum-use standards adapted to the terrain and soil materials, to minimize surface disturbance and damage to water quality.

(1) A flexible design will be to minimize damage to soil and water quality.

(2) Roads will be designed no wider than necessary to accommodate the immediate anticipated use.

(3) Cut and fill slopes would be designed at the normal angle of repose or less.

(4) Culvert out-flow would not be allowed to be discharged onto unprotected fill slopes. Energy dissipaters would be installed at culvert outlets or in half rounds where needed.

(5) Water crossing structures would be designed to provide for adequate fish passage, minimum **impact** on water quality, and the **25-year** frequency storm. Increases in water yield and peak flows **resulting** from vegetation removal would be kept in mind when designing structures.

(6) Roads will be designed to drain naturally by out-sloping and by grade changes wherever possible. Where **out-sloping** is not feasible, use roadside ditches and culverts to drain roads onto undisturbed ground.

(7) Dips, waterbars, and cross-drainage would be provided on all temporary roads.

(6) Drainage diversions would be placed above Stream crossings so that water may be filtered through vegetative buffers before entering the stream.

(9) Drainage would be provided where groundwater causes slope **instability**.

c. Road Construction. Road construction represents a principal source of sedimentation. Limit excavation to the practical, essential amount needed to meet the necessary road standards.

Plan for stabilization of soil exposed and for rehabilitation of other environmental damage during Construction.

5. Harvest Techniques. Sale layout planning will include planning for use of harvest systems that minimize damage to the site and to reserve trees and provide maximum protection from fire, insects, disease, wind, rodents and other hazards.

a. Felling. Directional felling systems would be used where needed to minimize **site** damage: to protect streams, buffer strips, riparian areas, cultural sites, or reserved timber (including wildlife trees); **or to** increase timber utilization,

b. Logging Systems. Logging systems that least disturb the soil mantle and streamside buffer strips are preferred to those methods that contribute to soil movement.

c. Landings. Landings will be of minimum size commensurate with safety and equipment requirements and located on stable areas so as to minimize the risk of material entering adjacent streams and waters. Landings should be located on firm ground above the high-water level of any stream. Landing locations on unstable areas, on steep side hill areas or areas which require excessive excavation should be avoided.

6. Soil Protection. Presewing the upper soil strata for the subsequent growing of future forest crops depends in large part on the care, planning, and professional judgement exercised in sale layout. No more than 12 percent of the **area would** be allowed to become compacted.

a. Protection of Watershed. Each sale will be planned to reduce to a minimum the amount of soil erosion resulting from road **construction**, logging, or slash disposal commensurate **with** practical logging procedures and reasonable **costs**.

b. **Revegetation.** Prompt planning will be undertaken for revegetation of roadway cut and fill slopes and other areas where soil has been seriously disturbed and **constitutes** an erosion and sedimentation hazard. Revegetation and erosion prevention measures may include mulching, seeding to grass or legumes, forbs, planting of **rapid-**

growth species of plants, seeding or planting Of **trees**, hydromulching and other appropriate soil stabilization practices.

7. Protection of streams, wetlands-riparian areas, and other waters.

When planning operations along streams, lakes, bogs, swamps, marshes, wet meadows, springs, seeps or other sources where the continuous presence of water is indicated, protect soil and vegetation from disturbances that could cause adverse effects on water quality and water quantity, wildlife and aquatic habitat. Special consideration will **be given** around sources that supply domestic water. Use streamside buffer strips along perennial and intermittent streams to reduce the quantity of sediment and logging wastes that might reach the stream, to help prevent stream water temperature increases, and to protect aquatic life, riparian zones and natural streamside beauty. Review decisions concerning management of riparian areas and wetlands made during the planning process regarding management objectives, vegetative composition, planned management actions, etc. If guidelines for marking buffer strips are not listed in the planning documents, the following guidelines should be observed:

a. Leave all hardwood trees critical to stream protection and shrubs, grasses, rocks and natural "down" timber that afford shade over a perennial stream or maintain stream bank protection. Where insufficient nonmerchantable tree species exist to provide up to a minimum 75% of original shade over the stream, a fringe of undisturbed merchantable trees may be required. These trees are also the future source of large woody debris for the stream and riparian areas.

b. All natural-occurring, large woody debris and tree boles should be left in the stream to provide habitat structure, unless blocking migrations of fish or recommended for removal by a hydrologist or biologist.

c. Neither an optimum nor a minimum width can be arbitrarily established for buffer strips. The necessary width varies with steepness of the terrain, the nature of the undercover, the kind of soil, the size of the stream, the width of the riparian area, and the amount of timber that is to be removed.

d. For effective filtering of sediment, buffer strips should be wide enough to entrap the material that **erodes from upslope** road construction or from adjacent logging areas. Under some conditions, and with careful control in adjacent logging areas, a relatively narrow buffer strip may suffice. But where excessive soil movement may occur, the buffer **strip** may have to be much wider and other precautions will have to be taken to eliminate adverse effects on stream water quality.

e. A modification of the buffer strip plan may involve removal of some merchantable trees from buffer strips as

decided by an interdisciplinary team during sale planning. Buffer strips may be protected by leaving stumps high enough to prevent **upslope** trees **from** rolling or sliding through the strips into the streams: by parallel felling; or by tree pulling or jacking.

f. Where timber should be removed because it would be subject to excessive windthrow and where it is **difficult** to leave an adequate **buffer of** timber to shade and protect the stream, plan to reestablish cover along the stream after cutting is completed. Fast growing deciduous species or other suitable vegetation may be required to restore shade as quickly as possible. Leave understory vegetation as undisturbed as possible to filter runoff and help stabilize the soil.

g. Intermittent streams in some areas may, during the wet season, produce enough **flow** to provide spawning areas for trout or anadromous fish and to carry silt loads to perennial streams. Intermittent streams with this potential will receive consideration **with** perennial streams for use of buffer strips.

8. Wildlife Considerations. Special care will be taken during sale layout planning to protect or preserve important wildlife and aquatic habitat. Identified crucial habitats may include big game winter ranges, migration routes, calving ground, strutting ground, nesting areas, and riparian zones. Maintain a minimum of 10% of the commercial forest acreages in old growth stage well distributed on a sustained yield basis. However, certain habitat considerations must be a part of every sale layout plan.

a. Legislated Action. Positive action will be taken to preserve sensitive threatened or endangered species and their habitat, **in** accordance **with** the mandates of the Endangered Species Act of 1973, the Bald Eagle Protection Act of 1940, Sikes Act of 1960, and existing Bureau policy.

b. Wildlife Tree (Snag) Management. Evenly distributed management will be provided for cavity dwellers on managed forest lands without creating logging safety hazards and without violating the decisions on which the allowable cut plan is based. Maximum use **should** be made of existing withdrawals to manage snags. These areas can be managed to contribute to the snag requirement while recently cut units may contain few or no snags. To meet the snag policy, wildlife trees/snags will be retained, as feasible, on each acre of managed forest land. Snag management in areas that are devoid of snags, or have limited existing snags, may require that an adequate number of green trees or culls be left per acre to maintain a **60-70%** viable population level of cavity dependent wildlife.

Specific **wildlife** tree/snag diameters (DBH) to be retained will be based on wildlife species requirements. When snag

management is not directed at specific species **habitat** requirements, then wildlife tree/snag diameter selection should be divided approximately equally between snags 25 inch DBH and larger, ranging to 50 feet in height, and snags 10-25 inches DBH over 6feet in height. Depending on the forest type, 108-158 trees per 100 acres of various size classes from 1 0-20 inch DBH **would** be left standing. In all cases leave all the soft snags and the largest available hard snags when a choice exists. In selecting wildlife trees, give special attention to snags and culls exhibiting heart rot, broken tops, external **fungal** conks, dead branch stubs, and signs of existing wildlife use.

c. Down Log Management. Provide at least 5 to 10 down logs per acre on lands in the intensive forest base. Each log should **have a** minimum dimension of **12"-17"x20'**. Meeting this goal should not be difficult under normal circumstances because **clearcut** units usually contain more material meeting the size requirements.

d. Opening (**Forages**)/**Cover** Ratio. Evaluate the opening (forage) and cover ratio in a proposed timber sale area when the sale involves big game habitat. Consult a wildlife biologist to determine how to obtain maximum benefits of timber harvest on the maintenance of optimum forage/cover ratios on deer and elk summer and winter ranges.

On land currently unsuited for the production of wood fibre. such as lakes, bogs, springs, swamps, wet meadows, or grasslands, strive to maintain thermal, hiding and survival **cover** for wildlife species.

Clearcutting operations will be planned so that adequate wildlife escape cover is available within one-eighth mile.

e. Access. The effect of accessibility and human disturbance on wildlife will be considered in road location and design. Closure of unneeded **roads** would take place upon completion of logging and, if necessary, seasonal closures of operations would take place during critical wildlife periods. The cumulative effects of the road transportation **network** will be considered on key areas that are crucial for big game winter survival and fawning/calving habitat.

9. Cultural Resources. Special consideration must be given during sale layout to protection and preservation of cultural resources as required by the Antiquities Act of 1906 and the National Historic Preservation Act of 1966.

10. Utilization, Slash Disposal and Site Preparation. Consideration of the following will be included in the sale planning efforts:

a. Utilization. Complete utilization is encouraged of all harvested trees, including marginal and non-commercial species. Each forest products sale will provide opportunity for maximum use of all timber or other vegetative

resources sold and to prevent destruction of unused materials provided that such utilization is consistent **with** wildlife requirements.

b. Slash Disposal and Site Preparation. To achieve fire hazard reduction, and to provide for reforestation and other intensive forest management opportunities, full consideration must be given at time of sale planning to the desirability and method of slash disposal and site preparation. Factors to **be** considered include but are not limited to **utilization of** material, removal of debris, smoke management, fire protection, watershed protection, soil compaction, nutrient loss, **wildlife** habitat requirements, animal damage, and reforestation requirements.

11. Reforestation. Each sale plan must include plans for prompt reforestation of the sale area after completion of the timber harvest operation by natural or artificial means.

12. Other Vegetative Resources. Preparation for sales of other vegetation resources or for small sales of minor forest products, may be somewhat less detailed than preparation for a regular timber sale. As a minimum, consider the following:

- a. Opportunity for sale and potential competitive interest,
- b. Land use plans and multiple-use relationships in the area, including MFP recommendations and decisions.
- c. **EA** for proposed action.
- d. Access to area.
- e. Land status.
- f. Property lines.
- g. Effect of sale on other forest products.
- h. Protection of reserved resources.
- i. Site protection.
- j. Emission control.
- k. Preservation of water quality.

II. Sale Layout

1. Plan. Prepare a layout plan after on-the-ground inspections of the sale area. Incorporate all applicable considerations listed in Section I, above, in the layout plan. The planned sale layout should be depicted on aerial photos and maps of the area, as best suited to the situation, with accompanying narrative.

2. Logging System. The layout plan must reflect selection of the optimum logging systems, taking into consideration the topography, size of cutting area, road locations, **silvicultural** prescriptions **for the** sale area, size of timber, location of protection areas and damageable sites, other multiple-use factors and harvest plans for removal of timber from adjacent reserved areas.

3. Road and Boundary Locations. On aerial photos **or maps**, show the following:

- a. Location and boundary of clear-cut areas, partial cuts areas, special cutting areas and special yarding areas.
 - b. Location of **reserve** areas or reseeded trees.
 - c. Location of property **boundaries**.
 - d. Location of mainline roads, logging spur **roads** and landing areas.
4. **Supervision.** Sale layout, in accordance with the layout plan, will be done by or under the supervision of a professional forester and in consultation with other disciplinary expertise. The marking and designation of cutting areas is a complex assignment, requiring the best effort of experienced forestry personnel. Most sale layout involves completion of plans and consideration for the following items:
- a. Location and identification of corners, **corner** monuments and property lines.
 - b. Mainline roads, spur roads, landings and road improvement work located, surveyed, or designed and staked and locations referenced.
 - c. **Rights-of-way** boundary involving new road **construction** blazed or painted and posted through timber areas.

Fire Management

1. Fuel mapping will be based on northern forest fire lab fuels models.
2. All planned/prescribed burns will have specific, measurable objectives. Objective monitoring will be the responsibility of the **benefitting** activity.
3. Pre-treatment and post-treatment monitoring of the five major soil nutrients (**N,P,K,Ca,Mg**) will occur on all planned/prescribed burns. Post-treatment monitoring will occur after the second and **fifth** growing season.
4. Planned/prescribed burns will not be conducted when soil moisture is **below** 60 percent.
5. Fire management activities will be conducted so that surface disturbance is minimized. Tractor fire trails will not be allowed in the planning area unless approved by the Area Manager.
6. Cultural resource protection will be the first **priority** of the area fire management program.
7. High value resource areas, developed areas, and areas where fire might pose a **life** threatening situation will be protected through intensity of attack.

8. All burn areas will receive at least two (2) growing seasons of post-fire rest from livestock grazing. If resource objectives have still not been met, then additional rest will be prescribed.

9. Planned/prescribed burn areas could receive a minimum of two (2) growing seasons pre-fire rest from livestock grazing to build fuels so that resource objectives can be met.

10. All unplanned ignitions will have post-burn review and evaluations in **order to** define appropriate multi-resource rehabilitation.

Recreation Sites

1. Project work undertaken within recreation **sites would** be designed and constructed to fit general layout and themes of **site**.

2. Project work undertaken near recreation sites **would** be designed and constructed with an adequate **buffer to provide** for protection of scenic values of recreation site will be established.

Visual Resource Management (VRM)

1. Class I - Primarily for **WSAs, RNAs, ACECs, ONAs, and Wild & Scenic Rivers**.

No projects will be allowed within these areas.

2. Class II - Primarily for areas of **high** scenic quality.

Any project work within a Class II area cannot be visible to a casual visitor **from** any travel route.

3. Class III - Primarily for areas considered important from an aesthetic view point. Not necessarily outstanding scenery.

Project **work can** be seen **within** a Class III area from travel routes. However, projects cannot be a focal point on the landscape.

4. Class IV - Primarily for general scenic landscapes throughout **much of** BLM.

Project work within a Class IV area can be a focal point on the landscape to the casual **visitor**.

5. Class V - Primarily for sites requiring reclamation (landfills, timbercuts, mining operations, etc.).

Project work within these areas is **virtually** unrestricted.

Cultural Resources

Management of cultural resources emphasizes protection and preservation. To meet these objectives, the Department of Interior has issued instructions setting forth preservation and protection guidelines. In accordance with the National Historic Preservation Act of 1966, as amended, Executive Order 11593 and BLM policy, appropriate measures (such as inventory and existing data review) would be taken to identify, protect, preserve and determine the significance of cultural properties prior to implementation of any project or plan. Prior to any activity plan or project that may adversely affect these properties, the appropriate State Historic Preservation Office (SHPO) will be consulted to determine effects upon the cultural resource. For any site within the project area determined eligible for the National Register of Historic Places, and determined to be adversely effected by the activity plan or project, mitigation measures **would** be undertaken. Appropriate mitigating measures and evaluation of effect on properties are determined in consultation with the State Historic Preservation Officer and National Advisory Council on Historic Preservation. Usually, project or plan redesign (location or method) will be employed where practical. Mitigation measures may include, but are not limited to, the following: 1) adjusting project boundaries to avoid impacting sites; 2) intensive documentation of the cultural resource before proceeding with project implementation; 3) adopting methods or techniques that would minimize direct and indirect disturbance to the site and its environmental setting; 4) removing and relocating historic cultural properties to another location after documentation and development of a management plan to maintain the values of the property; or 5) excavating the archaeological **properties with** the goal of preserving the values of the properties.

The inventory or mitigation will be directed by cultural resource specialists or through contracts with individuals or institutions meeting professional standards. Management plans will be developed for all National Register properties and others determined to need comprehensive management.

Special stipulations in contracts and leases, and acknowledgement of mining notices will be included to protect undiscovered or subsurface cultural resources not identified during inventory. In all cases, cultural resources discovered during an operation or activity on BLM land will be left intact **and** operations in the area suspended. Operations will not be resumed until written permission is received from the authorized officer. Cultural resources will be evaluated and protected in accordance with procedures under 36 CFR 600 and legislative requirements, including consultation with the State Historic Preservation Officer in the determinations of **eligibility** and effects.

Special stipulations on **fuelwood** (firewood cutting) permits: Standing dead trees within 100' of any historic

building or structural remains (for example cabins, barns, outbuildings, historic mining structures) must be felled away from the structure or remains.

See also Timber Harvest (**item 9**), Fire Management (item **6**), Locatable Mineral Development (Item **A2e**, citing the 43 CFR 3609 regulations).

Wildlife

No action will be taken by the BLM that could jeopardize the continued existence of any federally listed threatened or endangered plant or animal species. The U.S. Fish and Wildlife Service will be consulted regarding actions that affect habitat of these species. State sensitive species will be managed as though they were officially listed pursuant to the **Endangered Species Act of 1973**.

Consultation with the Oregon Department of Fish and Wildlife will be accomplished on major construction, **and/or** surface disturbing activities in high value wildlife areas.

Vegetation manipulation and revegetation projects in crucial wildlife areas would be done in irregular shape and to create a vegetation mosaic.

All areas where major vegetation manipulation or conversion occurs will be totally rested from livestock grazing for at least two growing seasons following treatment.

Wildlife escape devices will be installed and maintained in water troughs.

BLM will not do any action that would reduce minimum flow below **instream** flow recommended by ODFW on Class I fishable streams.

In crucial wildlife habitats major **construction** and maintenance work will be scheduled to avoid or minimize disturbance to wildlife. Areas disturbed during project construction **will** be reseeded with a mixture of grasses, **forbs** and shrubs to meet site specific needs or habitat requirements. All new fences will be built to standard Bureau wildlife specifications.

Appendix B Water Quality Measurements

Stream	Date	Time	Temperature of Air water	CFS	Turbidity	Spec Cond.	Total Alkalinity Mg/L as CaCO3	Total Hardness Mg/L as CaCO3	P h	Dissolved Oxygen Mg/L	Suspended Sedi ment Mg/L
Burnt River (below Unity Dam)	12/14/81				13	297			7.95		5
	3/16/82				21		66	43			7
	4/20/82				34			64		28	
	6/8/82				12	185	69	67		10	
	7/14/82				10	182	74	72	7.90		6
	8/17/82				7	204	85	83	7.90		3
	9/22/82				9	230	89	92	7.90		7
Burnt River (19.5 miles below Dam)	12/14/81				7	510			8.20		9
	3/16/82				26		95	88			24
	4/20/82				24			89			24
	6/8/82				14	311	124	118			18
	7/14/82				15	168	126	120	7.90		39
	8/17/82				14	298	120	115	7.90		40
	9/22/82				60	371	150	142	8.00		144
Burnt River (below Clarks Creek)	12/14/81				9	508			8.20		18
	3/16/82				30		103	96			24
	4/20/82				24			95			22
	6/8/82				12	336	139	130			18
	7/14/82				15	338	138	132	8.00		41
	8/17/82				10	365	158	153	8.00		34
	9/22/82				9	390	162	156	8.20		38
Burnt River (.5 mi upstream from French Gulch)	12/14/81				6	500			8.50		8
	3/16/82				32		103	99			28
	4/20/82				28			98			34
	6/8/82				11	338	140	134			27
	7/14/82				16	345	138	134	8.20		46
	8/17/82				10	382	159	154	8.30		33
	9/22/82				10	395	164	159	8.40		38
Burnt River (below Clarks Creek)	12/14/81				4	503			8.40		6
	3/16/82				38		104	101			56
	4/20/82				32			98			18
	6/8/82				12	342	141	135			32
	7/14/82				16	345	139	134	8.20		47
	8/17/82				10	319	161	157	8.50		39
	9/20/82			61	28		150		8.40	11	
Big Creek Balm Creek Lawrence Creek Dixie Cr #1 Dixie Cr #3	9/3/82			70	10		50		8.30	12	
	9/13/82			45	16		25		8.20	14	
	9/14/82			50	5		50		5.50	4	
	9/14/82			54	18		200		6.20	12	
	10/7/82			46	12		100		6.60	13	
	7/15/86	1050	68	61	7.5	3	15		7.60	10	
	7/15/86	1320	73	60	7.5	1	13		6.90	9	
Upper Elk Cr	7/16/86	1440	70	59	.5	5	147		7.00	11.6	
Lower Elk Cr	7/16/86	1510	71	58	.5	6	143		6.90	13	
Hibbard Creek	7/17/86	910	74	51	.3	17	205		6.90		
Fox Creek	7/17/86	1110	78	59	.3	3	66		6.70	13	
Morgan Creek	7/17/86	1305	84	89	.3	5	479		6.50	9	
Connor Creek	7/17/86	1510	88	89	2.4	5	312		6.90	10	

Appendix C Revised Table 11 Threatened, Endangered or Sensitive Species

Scientific Name	Common Name	State Status	¹ Federal Status	²
Animals				
<i>Haliaeetus leucocephalus</i>	Bald Eagle	2		1
<i>Buteo swainsoni</i>	Swainson's Hawk	3		2
<i>Buteo regalis</i>	Ferruginous Hawk			2
<i>Centrocercus urophasianus</i>	Western Sage grouse			2
<i>Tympanuchus phasianellus columbianus</i>	Columbian Sharp-tailed grouse	2		-
<i>Numenius americanus</i>	Long-billed curlew			2
<i>Plecotus townsendi townsendi</i>	Townsend's western big eared bat	1		2
"Recently extirpated in Oregon"				
Plants				
<i>Allium madidum</i> (D)	Swamp onion	3		-
<i>Allium robinsonii</i> (S)	Robinson's onion	2		3c
<i>Allium tolmei</i> var. <i>platyphyllum</i> (D)	Flat-leaved Tolmie's onion	3		-
<i>Arenaria franklinii</i> var. <i>thompsonii</i> (S)	Thompson's sandwort	1		2
<i>Astragalus atratus</i> var. <i>owyheense</i> (D)	Owyhee milkvetch	2		-
<i>Astragalus diaphanus</i> (D)	Transparent Milk-vetch	1		2
<i>Astragalus kentrophyta</i> var. <i>douglasii</i> (S)	Douglas Milk-vetch	1		2*
<i>Astragalus reventus</i> var. <i>reventus</i> (D)	Blue Mountain milkvetch	3		
<i>Betula papyrifera</i> var. <i>commutata</i> (D)	Paper birch	2		
<i>Bolandra oregana</i> (D)	Oregon bolandra	3		
<i>Bupleurum americanum</i> (D)	Bupleurum	2		
<i>Collomia macrocalyx</i> (S)	Bristle-flowered collomia	3		2
<i>Erigeron englemannii</i> (S)	Engelmann's daisy	2		
<i>Geum rossii</i> var. <i>tufbinatum</i> (D)	Slender-stemmed avens	2		
<i>Haplopappus radiatus</i> (D)	Snake River goldenweed	1		2
<i>Heuchera grossularifolia</i> var. <i>grossularifolia</i> (D)	Gooseberry-leaved alumroot	3		
<i>Leptodactylon hazelae</i> (D)	Hazel's prickly-phlox	1		
<i>Lomatium greenmanii</i> (S)	Greenman's lomatium	1		1
<i>Lomatium oreganum</i> (D)	Oregon lomatium	1		2
<i>Lomatium rollinsii</i> (D)	Rollin's lomatium	1		2
<i>Mimulus clivicola</i> (D)	Bank monkey flower	1		
<i>Mimulus washingtonensis</i> (S)	Washington monkey flower	1		
<i>Mirabilis macfarlanei</i> (S)	Macfarlane's four o'clock	1		LE
<i>Pleuropogon oregonus</i> (S)	Oregon semaphore grass	1		2
<i>Ribes irriguum</i> (D)	Idaho gooseberry	3		
<i>Rorippa columbiae</i> (S)	Columbia cress	1		2
<i>Rubus bartonius</i> (D)	Bartonberry	3		
<i>Salix bebbiana</i> (D)	Bebb's willow	2		
<i>Silene scaposa</i> var. <i>scaposa</i> (S)	Scapose catchfly	1		2
<i>Silene spaldingii</i> (S)	Spalding's campion	1		2
<i>Thelypodium eucosmum</i> (S)	Arrow-leaf Thelypody	1		2
<i>Thelypodium howellii</i> ssp. <i>spectabilis</i> (S)	Howell's spectacular thelypody	1		1

(D) = Documented (S) = Suspected

¹From "Rare, Threatened, & Endangered Plants & Animals of Oregon, Oregon Natural Heritage Data Base, March 1985

1. Endangered or threatened throughout range

2. Endangered or threatened in Oregon

3. Limited in abundance but currently stable

²From Federal Register Sep. 18 & 27, 1985

Category LE. Listed, Endangered

1. Proposed for listing

2. Candidate for listing; 2*. Candidate for listing, possibly extinct

3c. More widespread than originally thought

Appendix D Revised Table 36 Impacts to Air Quality from Average Annual Slash Burning and Prescribed Burning in the Planning Area

	1976 Baseline		No Action		Commodity Production		Natural Environmental Protection		Preferred	
	Acres	Tons/Fuel	Acres	Tons/Fuel	Acres	Tons/Fuel	Acres	Tons/Fuel	Acres	Tons/Fuel
Slash Burning (11.5 tons/acre)	197	5,812	186	2,139	193	2,220 *	153	1,760	177	2,036 *
Prescribed Burning (3.5 tons/acre)	10	35	200	700	100	350	800	2,800	500	1,750
Total Tons of Fuel		5,847		2,839		2,570		4,560		3,786

*The baseline year fuel load was calculated using 29.5 tons/acre which was based on calculations made by the Wallowa-Whitman National Forest.

Appendix E Proposed Mineral Withdrawals for Special Management Areas

Keating Riparian RNA/ACEC - Total Acres: 185

Balm Creek - Acres 75

T. 7 S., R. 43 E., WM

Sec. 31: S1/2 SE1/4 NE1/4 SE1/4;
W1/2 NE1/4 SE1/4 SE1/4;
E1/2 NW1/4 SE1/4 SE1/4;
SW1/4 SE1/4 SE1/4

T. 8 S., R. 43 E., WM

Sec. 6: E1/2 NE1/4 NW1/4 NE1/4;
SE1/4 NW1/4 NE1/4;
W1/2 NE1/4 SW1/4 NE1/4;
E1/2 NW1/4 SW1/4 NE1/4;
SW1/4 SW1/4 NE1/4
NW1/4 NW1/4 NW1/4 SE1/4;
E1/2 NE1/4 NE1/4 SW1/4;
SW1/4 NE1/4 NE1/4 SW1/4;
N1/2 SE1/4 NE1/4 SW1/4

Sawmill Creek - Acres 80

T. 8 S., R. 43 E., WM

Sec. 1: S1/2 SW1/4 NE1/4 SW1/4;
SW1/4 NE1/4 NW1/4 SW1/4;
NW1/4 NW1/4 SW1/4;
NE1/4 SW1/4 NW1/4 SW1/4;
SE1/4 NW1/4 SW1/4;
SW1/4 SW1/4 SE1/4;
SW1/4 SE1/4 SW1/4 SE1/4

Sec. 12: SW1/4 NW1/4 NE1/4 NE1/4;
NW1/4 SW1/4 NE1/4 NE1/4;
S1/2 SW1/4 NE1/4 NE1/4;
N1/2 NE1/4 NW1/4 NE1/4;
SE1/4 NE1/4 NW1/4 NE1/4;
S1/2 NE1/4 SE1/4 NE1/4;
E1/2 NW1/4 SE1/4 NE1/4;
SE1/4 SE1/4 NE1/4

Clover Creek - Acres 30

T. 7 S., R. 42 E., WM

Sec. 25: NE1/4 NW1/4 NW1/4;
E1/2 SW1/4 NW1/4 NW1/4;
W1/2 SE1/4 NW1/4 NW1/4;
N1/2 NW1/4 SW1/4 NW1/4;
SW1/4 NW1/4 SW1/4 NW1/4;
NW1/4 SW1/4 SW1/4 NW1/4

Oregon Trail - Total Acres: 200.29

Echo Meadows - Acres 55

T. 3 N., R. 28 E., WM

Sec. 22: NE1/4 NE1/4 SW1/4;
N1/2 NW1/4 NE1/4 SW1/4;
SW1/4 NE1/4 NE1/4 SE1/4;
S1/2 NW1/4 NE1/4 SE1/4;
N1/2 S1/2 NE1/4 SE1/4;
N1/2 NW1/4 SE1/4;
NE1/4 SE1/4 NW1/4 SE1/4

Straw Ranch - Acres 40

T. 10 S., R. 42 E., WM

Sec. 28: SW1/4 NW1/4 SW1/4 NW1/4;
SW1/4 SW1/4 NW1/4;
SW1/4 SE1/4 SW1/4 NW1/4;
SW1/4 NW1/4 NE1/4 SW1/4;
W1/2 SW1/4 NE1/4 SW1/4;
NE1/4 NW1/4 SW1/4;
NE1/4 NW1/4 NW1/4 SW1/4;
E1/2 SE1/4 NW1/4 SW1/4

Flagstaff Hill - Acres 105.29

T. 9 S., R. 41 E., WM

Sec. 6: Lot 3;
NW1/4 NE1/4 SE1/4 NW1/4;
NE1/4 NE1/4 SE1/4 NW1/4;
SE1/4 NE1/4 SE1/4 NW1/4;
SW1/4 NW1/4 SW1/4 NE1/4;
NW1/4 SW1/4 SW1/4 NE1/4;
NE1/4 SW1/4 SW1/4 NE1/4;
SE1/4 SW1/4 SW1/4 NE1/4;
SW1/4 SE1/4 SW1/4 NE1/4;
NW1/4 NE1/4 NW1/4 SE1/4;
NE1/4 NE1/4 NW1/4 SE1/4;
SE1/4 NE1/4 NW1/4 SE1/4;
SW1/4 NW1/4 NE1/4 SE1/4;
SW1/4 NE1/4 SE1/4;
NW1/4 SE1/4 NE1/4 SE1/4;
N1/2 NE1/4 SE1/4 SE1/4

Sec. 5: NW1/4 SW1/4 SW1/4;
S1/2 NE1/4 SW1/4 SW1/4;
SE1/4 SE1/4 SW1/4 SW1/4

Appendix F Land Tenure Adjustment Criteria

The land tenure adjustment criteria are identified to assist in categorizing the public lands for retention or disposal. Criteria are also provided to facilitate the selection of lands to be received in exchanges or other types of acquisition. The criteria range from specific to general and are designed to provide direction for resource area wide consistency while allowing the manager flexibility in identifying circumstances which dictate the category in which lands can be placed.

These criteria involve a **mixture** of diverse resource program thrusts that will allow the Baker Resource Area of the Vale District to focus **attention** in the retention zone, where maximum fiscal operational efficiencies and public benefits can be accomplished. These program thrusts are summarized and outlined as follows:

- Retain and manage the BLM administered public lands in the retention zone and lands. Exchanges of land in the retention Zone may be made to acquire other retention zone lands which would enhance resource management programs or improve public service.
- Continue the existing land exchange program, with the goal of consolidating the BLM administered landownership within the retention zone.
- Continue entering into any practical cooperative management agreements with other federal and state governmental agencies. The goal here is to manage the scattered and isolated parcels situated outside designated management areas in the most **efficient** manner.
- Continue to subject public land parcels in the disposal zones to exchange following site-specific environmental analysis of each parcel.
- Continue cooperating **with** other federal, state, and local governmental agencies, as well as appropriate private organizations, in development of needed recreation and other public purpose projects.

In addition to this policy, additional criteria that will be used in categorizing this public land for either retention or disposal, or requiring further study, as **well** as identifying acquisition opportunities and priorities, are summarized below. This list is not considered all-inclusive, but it represents the major factors that will be evaluated. The criteria that will be used include the following:

-public resource values that will benefit and enhance the range management, wildlife habitat, watershed, recreation, forestry, mineral, cultural resource, endangered, threatened, or sensitive plant and animal, and wilderness programs;

- access to public lands should be enhanced by the BLM acquiring key tracts or easements that would assure the public legal access to blocks of public lands. Improved access will generally increase recreational use in areas where a intermingled ownership pattern now restricts public use;
 - amount of public monetary investments in facilities or improvements on the public land and the potential for recovering those investments;
 - difficulty or costs in time and money in the effective managerial administration of the lands;
 - suitability or desirability of the land for management by another governmental agency;
 - significance of any subsequent land use decisions in stabilizing, enhancing, or hindering existing or potential **businesses, social and economic conditions, and/or life-styles**;
 - need for future mineral development;
 - encumbrances to the land, including, but not limited to, Recreation and Public Purposes and small tract leases and other leases and permits, rights-of-way, and withdrawals;
 - . consistency of the decision **with** cooperative agreements and plans or policies of other agencies.
 - suitability and need for change in landownership or use for purposes including, but not limited to, community expansion or economic development, such as residential, commercial, industrial, or agricultural (other than grazing) development; and
 - state and local governmental requests and recommendations for retention or disposal of BLM administered public land.
- Lands that fail to clearly meet either the retention or disposal criteria, will. Lands in this category will include:
- lands where disposition would pose questions as to consistency with other Federal, state, local government or tribal land use plans.
 - lands under withdrawal review.
 - . lands where less than full fee conveyance would reserve specifically identified significant public values to protect public interests.
 - lands where management is not cost-effective, but not clearly negative, and multiple use values are marginal.

- lands where cooperative management best serves the public interest.
- lands with potential for future public use based on developing needs.
- lands with potential for transfer under the Good Neighbor program.
- lands in areas of public access deficiencies.

Generally public land within the retention zone (see maps 1 and 7 of the Draft RMP/EIS) will remain in public ownership and continue to be administered by the Bureau of Land Management. Transfers to other agencies will continue to be considered where additional public benefits will be derived or where improved management efficiency will result. Any site-specific adjustment decisions will be based on the application of the criteria stated above, and each situation will be evaluated on its own merits.

Public land to be sold must meet at least one of the criteria cite in Section 203 (a) of the Federal Land Policy and Management AU: (1) such tract because of its location or other characteristics is **difficult** and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department or agency; or (2) such tract was acquired for a specific purpose and the tract is no longer required **for that** or any other Federal purpose; or (3) disposal of such tract will serve important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would serve by maintaining such tract in Federal ownership.

Public land will only be sold when the following criteria are met: (1) it is required by national policy; (2) it will achieve disposal objectives on a timely basis and where disposal through exchange would cause unacceptable delays; (3) it is determined that disposal through exchange is not feasible; or (4) it is required to facilitate title clearance.

The preferred method of selling public land would be by competitive sealed bidding by qualifying purchasers. However, modified **competitive** bidding or direct sale procedures may be used when necessary to avoid jeopardizing an existing use on adjacent land or to avoid dislocation of existing public land users. No land will be sold for a monetary amount less than fair market value, as determined by appraisal.

Public lands to be exchanged must meet the criteria established by Sections 102, 205, and 206 of the Federal Land Policy and Management Act. The following land exchange criteria are designed to provide consistent direction, while allowing the line manager flexibility to meet

local, state and national needs. All proposals will be evaluated to determine **if** the selected lands will:

-facilitate access to areas retained for long term public use.

- enhance Congressionally designated areas, rivers or trails.

- be primarily in the "retention" areas. Acquisition in "Further **Study**" areas or "disposal" areas will only be considered if the action leads to and/or facilitates long term needs or program objectives.

-facilitate national, state and local BLM priorities or mission statement needs.

- stabilize or enhance local economic values

- meet long term public land management goals as opposed to short term.

- be of sufficient size to improve use of adjoining lands, or if isolated, large enough in scale to allow the identified potential public land use.

- allow more diverse use, more intensive use, or a change in uses to better fulfill the Bureau's mission.

- maintain or enhance important and recognized public land values. Especially noteworthy are identified, designated, special or high interest value areas.

- enhance the opportunity for new or emerging public land uses or values.

- contribute to a wide spectrum of uses or large number of public **land** users.

-facilitate management practices, uses, scale of operations or degrees of management intensity that are viable under economic program efficiency standards.

- secure the public significant water related land interests. These interests will include lake shore, riverfront, stream, pond or spring **sites**.

The following major land transfer actions are listed in their order **of** preference:

1. State Lieu and State Grant selections,
2. State Exchanges,
3. Private Exchanges,
4. Recreation and Public Purpose patents,
5. BLM/US Forest Service jurisdictional transfers (These are jurisdictional transfers usually involving limited

acreages; it does not refer to the proposed BLM/Forest Service interchange that is presently under consideration.),

6. Withdrawals for other federal agencies,
7. Public sales,
8. Indian allotments, or
9. Desert land entries.

Table F1 - Potential Land Disposal Tracts

<u>Description</u>	<u>Acreage</u>
Umatilla County (2783 acres)	
T. 3 N., R. 27 E. Sec. 2: SE1/4SE1/4 12: S1/2SE1/4 24: SW1/4	40.00 80.00 160.00
T. 2 N., R. 8 E. Sec. 10: NW1/4SW1/4 28: E1/2E1/2	40.00 160.00
T. 4 N., R. 28 E. Sec. 14: Aportion of S1/2SE1/4SW1/4	7.47
T. 5 N., R. 28 E. Sec. 26: W1/2NW1/4SW1/4, SW1/4SW1/4, N1/4SE1/4SW1/4 28: E1/2E1/2 32: W1/2NE1/4 34: S1/2SW1/4NW1/4	80.00 160.00 80.00 20.00
T. 5 N., R. 29 E. Sec. 22: SW1/4NW1/4 34: NE1/4NE1/4	40.00 40.00
T. 5 N., R. 30 E. Sec. 4: SE1/4NE1/4 10: S1/2 11: E1/2W1/2 13: SE1/4	40.00 320.00 160.00 160.00
T. 5 N., R. 31 E. Sec. 2: Lot 3 8: SW1/4SE1/4	34.50 40.00
T. 6 N., R. 31 E. Sec. 17: Lot 3	37.05
T. 6 N., R. 32 E. Sec. 15: Lot 4	40.09

T. 3 N., R. 36 E. Sec. 14: E1/2SW1/4, NW1/4SE1/4 23: NE1/4NW1/4	120.00 40.00
T. 4 N., R. 37 E. Sec. 4: Lot 4	48.22
T. 1 S., R. 30 E. Sec. 8: SW1/4NE1/4	40.00
T. 3 S., R. 30 E. Sec. 24: SW1/4SE1/4	40.00
T. 4 S., R. 30 E. Sec. 9: SW1/4SE1/4	40.00
T. 6 S., R. 30 E. Sec. 33: SW1/4NE1/4	40.00
T. 3 S., R. 30 1/2 E. Sec. 25: Lot 3 36: Lots 1, 2, 3, & 4	22.52 91.74
T. 2 S., R. 31 E. Sec. 12: NE1/4NE1/4	40.00
T. 3 S., R. 31 E. Sec. 17: S1/2SW1/4	80.00
T. 4 S., R. 31 E. Sec. 28: SW1/4SE1/4 28: W1/2NE1/4	40.00 80.00
T. 5 S., R. 31 E. Sec. 6: SE1/4NE1/4	40.00
T. 6 S., R. 31 E. Sec. 29: SE1/4SW1/4	40.00
T. 2 S., R. 33 E. Sec. 4: Lot 2 5: Lots 10, 11 & 13 9: Lots 5 & 8 11: Lot 3 13: Lot 6 19: Lots 4 & 16	3.05 33.46 31.61 2.08 11.63 74.27
T. 5 S., R. 33 E. Sec. 19: SE1/4NW1/4 30: SE1/4NW1/4	40.00 40.00
T. 2 S., R. 34 E. Sec. 13: Lot 5	5.07

Description	Acreage
Asotin County (591 acres)	
T. 6 N., R. 44 E. Sec. 10: SE1/4NE1/4, NE1/4SE1/4 11: NW1/4SW1/4 15: Lots 1 & 4	80.00 40.00 70.78
T. 7 N., R. 44 E. Sec. 12: W1/2NW1/4, NW1/4SW1/4	120.00
T. 7 N., R. 45 E. Sec. 28: SW1/4NE1/4	40.00
T. 7 N., R. 46 E. Sec. 2: NW1/4SE1/4 11: SW1/4NE1/4 15: SE1/4SW1/4 18: NW1/4SE1/4 19: SE1/4SE1/4 22: NE1/4NW1/4	40.00 40.00 40.00 40.00 40.00 40.00
Wallowa County (1244 acres)	
T. 4 N., R. 43 E. Sec. 4: NW1/4SE1/4 10: SE1/4NE1/4 11: SE1/4SE1/4	40.00 40.00 40.00
T. 6 N., R. 44 E. Sec. 14: Lots 2.3 & 4 17: Lot 4	54.79 19.66
T. 1 N., R. 45 E. Sec. 1: Lot 7 2: Lot 6	8.12 3.62
T. 1 1/2 N., R. 45 E. Sec. 35: Lots 1, 2 & 3	3.53
T. 5 N., R. 45 E. Sec. 10: SE1/4NW1/4 11: NE1/4NW1/4	40.00 40.00
T. 2 N., R. 45 1/2 E. Sec. 6: Lot 2	7.19
T. 2 N., R. 46 E. Sec. 30: Lot 7	14.79
T. 3 N., R. 48 E. Sec. 34: SE1/4NW1/4	40.00
T. 5 N., R. 46 E. Sec. 6: S1/2NE1/4, W1/2SE1/4 Sec. 3: SE1/4SW1/4 9: SE1/4NE1/4	160.00 40.00 40.00

Description	Acreage
T. 2 N., R. 47 E. Sec. 13: NE1/4NE1/4 31: Lots 8, 11 & 18	40.00 1.60
T. 6 N., R. 47 E. Sec. 32: SW1/4NW1/4 33: NE1/4NW1/4	40.00 40.00
T. 1 S., R. 45 E. Sec. 24: SW1/4SE1/4	40.00
T. 1 S., R. 46 E. Sec. 1: Lots 3 & 6 20: SE1/4SE1/4 23: SE1/4SW1/4 28: SE1/4SW1/4	90.50 40.00 40.00 40.00
T. 2 S., R. 46 E. Sec. 10: NW1/4SE1/4 23: NE1/4SE1/4 24: SE1/4NE1/4	40.00 40.00 40.00
T. 1 S., R. 47 E. Sec. 32: NE1/4SE1/4 33: NE1/4NE1/4	40.00 40.00
T. 2 S., R. 47 E. Sec. 22: SW1/4SW1/4 29: SW1/4SW1/4	40.00 40.00
Morrow County (786 acres)	
T. 2 N., R. 27 E. Sec. 6: Lot 3	40.00
T. 4 N., R. 26 E. Sec. 8: S1/2NE1/4, N1/2SW1/4	160.00
T. 5 N., R. 27 E. Sec. 20: Unlotted portion of NW1/4SW1/4	18.00
T. 3 S., R. 23 E. Sec. 31: Lots 2.3, & 4, E1/2SW1/4, W1/2SE1/4, SE1/4SE1/4 32: SW1/4SW1/4	354.10 40.00
T. 1 S., R. 24 E. Sec. 24: Lot 2	39.81
T. 2 S., R. 29 E. Sec. 1: NW1/4SE1/4	40.00
T. 4 S., R. 29 E. Sec. 3: Lots 1, 2, 3, & 4 4: Lots 1 & 2	61.96 32.00

Description	Acreage
Union County (1275 acres)	
T. 1 N., R. 41 E. Sec. 19: SE1/4SE1/4	40.00
T. 4 S., R. 35 E. Sec. 4: NE1/4SW1/4 17: SE1/4SE1/4	40.00 40.00
T. 4 S., R. 39 E. Sec. 29: N1/2NW1/4	80.00
T. 5 S., R. 39 E. Sec. 1: NE1/4SW1/4 3: NE1/4SE1/4 14: NE1/4NE1/4, W1/2SE1/4	40.00 40.00 120.00
T. 1 S., R. 40 E. Sec. 15: NE1/4SW1/4	40.00
T. 5 S., R. 40 E. Sec. 15: NW1/4NW1/4, NE1/4SW1/4 22: SW1/4NE1/4	80.00 40.00
T. 6 S., R. 40 E. Sec. 3: SW1/4NE1/4 13: SW1/4NE1/4 24: SW1/4SE1/4 25: NE1/4NW1/4 26: Lot 1	40.00 40.00 40.00 40.60 40.87
T. 6 S., R. 41 E. Sec. 20: SE1/4NW1/4 21: E1/2NW1/4 28: NE1/4NW1/4 30: Lot 3 33: SW1/4SW1/4 34: NW1/4NE1/4 36: Lots 1, 2, 3, 4, 5, 6, 7 & 8, NW1/4NE1/4	40.00 80.00 40.00 40.80 40.00 40.00 123.47
T. 6 S., R. 42 E. Sec. 30: W1/2NE1/4 31: Lot 3, excepting that portion in MS 680	80.00 30.00
Baker County (11,628 acres)	
T. 13 S., R. 36 E. Sec. 15: SW1/4NE1/4	40.00
T. 12 S., R. 37 E. Sec. 13: SE1/4NW1/4, NE1/4SW1/4 14: SE1/4NE1/4, E1/2NW1/4	80.00 120.00

Description	Acreage
T. 13 S., R. 37 E. Sec. 5: S1/2NE1/4 9: NE1/4NE1/4 15: E1/2NE1/4 27: NW1/4SW1/4 30: SE1/4NW1/4	80.00 40.00 80.00 40.00 40.00
T. 14 S., R. 37 E. Sec. 6: Lot 3	37.73
T. 12 S., R. 38 E. Sec. 2: Lot 2, SW1/4SE1/4 4: Lot 3 22: NE1/4SE1/4	79.53 40.73 40.00
T. 13 S., R. 38 E. Sec. 19: E1/2SE1/4 20: W1/2SW1/4, NE1/4SW1/4 NW1/4SE1/4	60.00 160.00
T. 14 S., R. 38 E. Sec. 4: Lot 3, SE1/4NW1/4	80.44
T. 7 S., R. 39 E. Sec. 26: W1/2SE1/4, SE1/4SE1/4 35: N1/2NE1/4	120.00 80.00
T. 9 S., R. 39 E. Sec. 8: Unnumbered Lot	0.78
T. 10 S., R. 39 E. Sec. 13: W1/2NE1/4, SE1/4NW1/4, W1/2SW1/4, SE1/4SW1/4 14: SE1/4SE1/4 33: SW1/4SW1/4	240.00 40.00 40.00
T. 11 S., R. 39 E. Sec. 2: Lots 1 & 2 31: Lot 3	70.17 33.37
T. 12 S., R. 39 E. Sec. 5: Lot 1, SE1/4NE1/4	72.48
T. 6 S., R. 40 E. Sec. 18: Lot 6	10.42
T. 7 S., R. 40 E. Sec. 26: NE1/4NE1/4	40.00

Description	Acreage
T. 9 S., R. 40 E.	
Sec.26: S1/2NE1/4, E1/2NW1/4, NW1/4NW1/4, N1/2SW1/4, W1/2SE1/4	360.00
27: E1/2NE1/4, SW1/4NE1/4, NE1/4SE1/4	160.00
34: SW1/4NW1/4, W1/2SW1/4, SE1/4SW1/4	160.00
35: NW1/4NE1/4	40.00
T. 10 S., R. 40 E.	
Sec. 1: That parlof Lot 1 in the S1/2NE1/4, That part of Lot 2 in the N1/2NE1/4, N1/2SE1/4	240.20
3: That part of Lot 1 in the SW1/4NW1/4, That part of Lot 2 in the NW1/4NW1/4, NW1/4SW1/4	120.37
T. 11 S., R. 40 E.	
Sec. 6: SE1/4NE1/4	40.00
T. 12 S., R. 40 E.	
Sec. 28: NW1/4SW1/4	40.00
29: SE1/4SW1/4	40.00
T. 13 S., R. 40 E.	
Sec. 2: Lot 3	40.44
9: SE1/4NW1/4, NE1/4SW1/4, SE1/4	240.00
10: N1/2SW1/4	80.00
T. 7 S., R. 41 E.	
Sec. 1: NW1/4SW1/4	40.00
4: Lots 3 & 4, SE1/4SW1/4, NE1/4SW1/4	160.80
7: Lots 1 & 2	74.30
11: SW1/4SE1/4	40.00
12: SW1/4SW1/4	40.00
14: SE1/4NE1/4, NW1/4NE1/4	80.00
23: SE1/4NW1/4	40.00
26: SE1/4NE1/4, E1/2SW1/4, SE1/4	280.00
35: N1/2NE1/4, NE1/4NW1/4, SE1/4NE1/4	160.00
T. 8 S., R. 41 E.	
Sec. 7: Lot 4	39.34
9: W1/2SE1/4	80.00
19: N1/2NE1/4	80.00
28: N1/2SE1/4	80.00
T. 9 S., R. 41 E.	
Sec. 24: NW1/4SW1/4	40.00

Description	Acreage
T. 10 S., R. 41 E.	
Sec. 9: NE1/4NE1/4	40.00
10: SE1/4SE1/4	40.00
12: S1/2NE1/4, SE1/4SE1/4	120.00
13: NE1/4NE1/4	40.00
14: E1/2NW1/4, NE1/4SW1/4	120.00
15: N1/2SW1/4, SE1/4SW1/4	120.00
18: N1/2SE1/4	80.00
21: NE1/4NE1/4, SE1/4NW1/4	80.00
22: NW1/4NW1/4	40.00
T. 8 S., R. 42 E.	
Sec. 24: E1/2E1/2	160.00
T. 9 S., R. 42 E.	
Sec. 25: S1/2S1/2	160.00
35: SW1/4NE1/4, SE1/4NW1/4, NE1/4SW1/4, NW1/4SE1/4	160.00
T. 10 S., R. 42 E.	
Sec. 6: SW1/4SE1/4	40.00
11: NE1/4SE1/4	40.00
17: SE1/4SW1/4	40.00
18: Lot 1, SE1/4SW1/4, E1/2SE1/4	159.23
T. 11 S., R. 42 E.	
Sec. 3: NW1/4SW1/4	40.00
4: S1/2NE1/4	80.00
8: SW1/4NW1/4	40.00
T. 12 S., R. 42 E.	
Sec. 13: Portions of Golden Horseshoe Lode, Freegold No. 4 Lode, CKC Lode	32.02
24: Portions of Mary Lode, Freegold No. 1, No. 2, No. 4 Lodes	44.22
T. 8 S., R. 43 E.	
Sec. 19: Lots 1, 2, & 3, W1/2NE1/4, E1/2NW1/4, NE1/4SW1/4, NW1/4SE1/4	381.15
30: Lots 2, 3, & 4, E1/2SW1/4, W1/2SE1/4, NE1/4NE1/4	337.50
29: W1/2NW1/4, NW1/4SW1/4	120.00
T. 9 S., R. 43 E.	
Sec. 15: SW1/4SE1/4	40.00
22: NW1/4NE1/4	40.00
30: Lot 3	38.27
31: N1/2NE1/4	80.00
32: SW1/4NW1/4, NW1/4SW1/4	80.00

Description	Acreage
T. 10 S., R. 43 E.	
Sec. 3: SE1/4SE1/4	40.00
4: N1/2SW1/4, SE1/4SW1/4	120.00
5: Lot 3, SW1/4NE1/4, SW1/4SW1/4, N1/2SE1/4	200.00
11: E1/2SW1/4	80.00
23: SE1/4NE1/4, N1/2SE1/4	120.00
24: NW1/4SW1/4	40.00
26: E1/2NE1/4	80.00
T. 11 S., R. 43 E.	
Sec. 23: N1/2SW1/4, NW1/4SE1/4	120.00
31: SW1/4SE1/4	40.00
35: NE1/4SW1/4	40.00
36: N1/2	320.00
T. 12 S., R. 43 E.	
Sec. 18: Lots 7, 9, 10, 11 & 12, Little Bess Lode, Freegold No. 8 and portions of Golden Horseshoe, Freegold No. 4 & No. 5	137.00
19: Lot 4, Freegold No. 3, portions of Freegold No. 2 and Mary Lode	101.27
23: NW1/4SW1/4	40.00
T. 8 S., R. 44 E.	
Sec. 13: SE1/4SE1/4	40.00
15: Lot 3	27.58
21: Lots 1 & 2, Ollie Woodman Lode	26.00
22: Lot 3	10.80
T. 9 S., R. 44 E.	
Sec. 23: SE1/4NW1/4, S1/2SE1/4	120.00
24: SE1/4NE1/4	40.00
26: NW1/4NE1/4, SW1/4SE1/4, E1/2SE1/4	160.00
27: NW1/4NW1/4, NW1/4SE1/4	60.00
31: E1/2SW1/4, NW1/4SE1/4	120.00
34: SW1/4SE1/4	40.00
T. 10 S., R. 44 E.	
Sec. 2: SW1/4SW1/4	40.00
3: NW1/4SE1/4	40.00
6: Lots 3 & 4	77.21
18: Lots 2 & 3	77.39
T. 11 S., R. 44 E.	
Sec. 19: Lot 1	9.70
33: SE1/4SW1/4	40.00
T. 12 S., R. 44 E.	
Sec. 31: Lots 2, 3, & 4	130.62

Description	Acreage
T. 8 S., R. 45 E.	
Sec. 28: W1/2W1/2SE1/4SW1/4	10.00
T. 9 S., R. 45 E.	
Sec. 19: Lots 2, 3, & 4, E1/2SW1/4	197.87
30: Lot 3	39.48
35: E1/2SW1/4	80.00
T. 11 S., R. 45 E.	
Sec. 12: S1/2NE1/4, N1/2SE1/4	160.00
T. 13 S., R. 45 E.	
Sec. 30: Lot 3	40.06
T. 14 S., R. 45 E.	
Sec. 19: SW1/4NE1/4, W1/2SE1/4	120.00
30: N1/2NW1/4NE1/4	20.00
T. 7 S., R. 46 E.	
Sec. 25: E1/2E1/2, NW1/4NE1/4	200.00
36: E1/2NE1/4, NE1/4SE1/4	120.00
T. 8 S., R. 46 E.	
Sec. 1: Lot 2	40.00
T. 9 S., R. 46 E.	
Sec. 11: SW1/4NE1/4	40.00
T. 11 S., R. 46 E.	
Sec. 7: Lots 1, 2, 3 & 4, E1/2SW1/4, N1/2SE1/4	320.96
T. 7 S., R. 47 E.	
Sec. 30: Lots 1, 2, 3, & 4	166.48
31: Lots 1 & 2, NE1/4NE1/4, S1/2SW1/4NE1/4	142.40